

|  |
|--|
| <b>Respondent Name</b>   |
| Kshama Solidarity Campaign   |
| <b>Complainant Name</b>  |
| Glen Morgan  |
| <b>Complaint Description</b>   |
| <p><a href="#">Glen Morgan</a> (Thu, 29 Oct 2020 at 11:15 AM)</p> <p>To whom it may concern</p> <p>It has come to my attention that the Kshama Solidarity Committee PAC has violated Washington State's Campaign Finance laws in 2020 while fundraising to resist the recall campaign which has been filed against City Councilmember Kshama Sawant. Please note the C1PC for this campaign can be found linked here:</p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=20034">https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=20034</a></p> <p>The specific violations of this law are detailed below.</p> <p><b>1) Accepting Illegal Campaign contribution from Foreign National (Violation of RCW 42.17A.417(1))</b></p> <p>This PAC has accepted at least one (and probably more) contributions from a foreign national during this 2020 campaign to fight the attempt to recall her from public office. Specifically, the contribution reported on the attached C3 report (<b>PDC Tracking # 101003996</b>) – see <b>page 17</b> filed on October 7, 2020 details a political campaign contribution by Nayon Park, with a listed Seattle address. Just as a reminder, this is the same person who also illegally contributed to Kshama Sawant's campaign for Seattle City Council, but that was addressed in a separate complaint.</p> <p>Nayon Park is a citizen of Korea and NOT a US citizen, by his own admission when he filed a lawsuit recently in King County against the State of Washington (along with other plaintiffs) in opposition to Washington State's campaign finance restrictions on foreign donors to political campaigns. I have attached a copy of this lawsuit as evidence. Specifically, on <b>Page 3, Section II "Parties, Jurisdiction and Venue" in section 1.6, it states:</b></p> <p>"Plaintiff Nayon Park is a citizen of South Korea and lawful F-1 visa holder who resides in Seattle, Washington. Ms. Park is a member of and steward for Local 4121. She also serves on the union's Joint Council as a Head Steward"</p> <p>Nayon Park has sworn to the accuracy of this document and it should be considered sufficient evidence to prove that this contribution made to a local well-funded super PAC was illegal, and this campaign has violated Washington State's campaign finance laws, once again, in accepting this contribution.</p> <p>At a minimum, this PAC must refund the illegal contributions from this donor, and a penalty must be imposed by the PDC consistent with the statute. There is an increasing concern that the campaign finance laws are not being applied equally to the powerful and politically connected, and this case should be an example that not even a powerful, vindictive Seattle City Councilmember who claims to be a Socialist can exempt themselves from complying with the laws which apply to other, much less powerful or politically connected people.</p> <p>Kshama Sawant is a well-known frequent violator of campaign finance laws in Washington State. Please note, for the record, the following examples:</p> |

• **PDC Case #11340** – A complaint filed by Glen Morgan, a \$150 penalty was imposed by the SEEC after the PDC referred the matter to the Seattle Ethics and Elections Commission. In the attached letter, in addition to the additional penalty imposed as a result of this investigation, previous fines of \$1500 had been imposed for additional violations of campaign finance laws in 2016. Mostly these violation involved concealing contributions or expenditures from the public

• **PDC Case #65026** – This was another complaint filed by Glen Morgan and combined with a complaint filed by Kevin Schofield. This was referred to the SEEC where the violation was dealt with through “deferred enforcement” earlier this year. This was mainly involving misuse of public resources to promote Sawant’s political campaign.

Please let me know if you need further evidence in this matter.

Best Regards,

Glen Morgan

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

The public has a right to know when foreign nationals attempt to influence local elections and and dark money Super PACs like this one.

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

All attached

**List of potential witnesses with contact information to reach them**

All the people involved in this campaign.

**Certification (Complainant)**

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.

# CASH RECEIPTS MONETARY CONTRIBUTIONS

# C3

(1/02)

THIS SPACE FOR OFFICE USE

101003996

10-07-2020

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

**Kshama Solidarity Campaign**

Mailing Address

**1404 E Yesler Way, Suite B**

City

**Seattle, WA**

Zip + 4

**98122**

Office Sought (candidates)

Election Date

**2021**

## 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date Received |  | Amount | Total |
|---------------|--|--------|-------|
|               | a. Anonymous .....   |        |       |
|               | b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) .....        |        |       |
|               | c. Loans, notes, security agreements. Attach Schedule L .....                                    |        |       |
|               | d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....         |        |       |
|               | e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons) |        |       |

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                                   | Contributions of more than \$100:*<br>Employer's Name, City and State | P<br>R<br>I<br>N<br>T | G<br>E<br>N | Amount      | Aggregate*<br>Total       |
|---------------|---|---|-----------------------|-------------|-------------|---------------------------|
| 09/16/20      | SONJA PONATH<br>15224 97th Ct NE<br>Bothell, WA 98011                           |   |                       |             | \$25.00     | \$75.00                   |
|               | Occupation  |   |                       |             |             |                           |
| 09/16/20      | JEFF REIFMAN<br>700 N 67th St<br>Seattle, WA 98103                              |   |                       |             | \$25.00     | \$25.00                   |
|               | Occupation  |   |                       |             |             |                           |
| 09/16/20      | AARON BOWERSOCK<br>4005 34th Ave S<br>Seattle, WA 98118                         |   |                       |             | \$25.00     | \$25.00                   |
|               | Occupation  |   |                       |             |             |                           |
| 09/16/20      | DAVID BERGVELT<br>206 Bell St Apt 707<br>Seattle, WA 98121                      | Amazon<br><br>Seattle, WA   |                       |             | \$500.00    | \$500.00                  |
|               | Occupation  | SOFTWARE DEVELOPMENT ENGINEER   |                       |             |             |                           |
| 09/16/20      | ROWAN CHAMBERLAIN<br>3801 Stone Way N Apt #354<br>Seattle, WA 98103             |   |                       |             | \$15.00     | \$15.00                   |
|               | Occupation  |   |                       |             |             |                           |
|               | <input checked="" type="checkbox"/> Check here if additional pages are attached | Sub-total   |                       |             | \$590.00    | *See reverse for details. |
|               |   | Amount from attached pages  |                       |             | \$28,707.71 |                           |
|               |   |   |                       |             | \$29,297.71 |                           |

## 3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

**09/28/20**

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

**Sonja Ponath**

**10-07-2020**

Treasurer's Daytime Telephone No.: **(206)954-9962**

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                    | Contributions of more than \$100:<br>Employer's Name, City and State                  | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|----------|---------------------|
| 09/16/20      | JACK ZHANG<br>566 Washington St 15<br>Brighton, MA 02135         | Bose Corp<br>100 The Mountain Rd, MA<br>Occupation <b>PRINCIPAL SOFTWARE ENGINEER</b> |             |             | \$500.00 | \$500.00            |
| 09/16/20      | BEATRIZ LACOMBE<br>11358 12th Ave NE<br>Seattle, WA 98125-6306   | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/16/20      | KAILYN NICHOLSON<br>12018 Sand Point Way NE<br>Seattle, WA 98125 | dba Kailyn Nicholson<br>Seattle, WA<br>Occupation <b>ORGANIZER</b>                    |             |             | \$50.00  | \$150.00            |
| 09/16/20      | AVA PRIEST<br>16417 125th Ct NE<br>Woodinville, WA 98072         | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/16/20      | JACK GANLEY<br>403 Ocean Ave APT #2B<br>Brooklyn, NY 11226       | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/16/20      | JUSTIN HARRISON<br>1135 Allengrove St<br>Philadelphia, PA 19124  | Verizon<br>Philadelphia, PA<br>Occupation <b>TELECOM CONSTRUCTION</b>                 |             |             | \$500.00 | \$500.00            |
| 09/16/20      | ALBERT SWEIGART<br>PO Box 9732<br>Seattle, WA 98109              | dba Albert Sweigart<br>Seattle, WA<br>Occupation <b>AUTHOR</b>                        |             |             | \$500.00 | \$500.00            |
| 09/16/20      | JONATHAN ROSENBLUM<br>4212 S Orcas St<br>Seattle, WA 98118       | City of seattle<br>Seattle, WA<br>Occupation <b>COMMUNITY ORGANIZER</b>               |             |             | \$500.00 | \$500.00            |
| 09/16/20      | BARBARA PHINNEY<br>12248 Phinney Ave N<br>Seattle, WA 98133      | Seattle, WA<br>Occupation <b>RETIRED</b>  |             |             | \$25.00  | \$106.00            |
| 09/16/20      | JOSEPH SUGRUE<br>4513 Greenwood Ave N 6<br>Seattle, WA 98103     | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/16/20      | ANDREW LIN<br>3636 Osprey Ln<br>Powell, OH 43065                 | Occupation  |             |             | \$100.00 | \$100.00            |

Page Total **\$2,365.00**

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 3

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                         | Contributions of more than \$100:*<br>Employer's Name, City and State    | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|--|-------------|-------------|----------|---------------------|
| 09/16/20      | JUSTIN BARE<br>12508 Lake City Way NE Apt 316<br>Seattle, WA 98125    | Sincro LLC<br>Seattle, WA<br>Occupation <b>SOFTWARE ENGINEER</b>         |             |             | \$500.00 | \$1,000.00          |
| 09/16/20      | MICHAEL JOHNSON<br>1214 W Green St<br>Champaign, IL 61821             | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | KEVIN VITZ-WONG<br>5518 4th Ave NW<br>Seattle, WA 98107               | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/16/20      | TIMOTHY CLOUGH<br>31 W Main St Apt. 2E<br>Wilmington, VT 05363        | Village roost<br>Wilmington, VT<br>Occupation <b>COOK</b>                |             |             | \$250.00 | \$250.00            |
| 09/16/20      | BION JOHNSON<br>1820 S Weller St<br>Mountain View, CA 98144           | Google LLC<br>Seattle, WA<br>Occupation <b>SOFTWARE ENGINEER</b>         |             |             | \$250.00 | \$250.00            |
| 09/16/20      | BEN HULSEY<br>602 Melrose Ave E # 401<br>Seattle, WA 98102            | dba Ben Hulsey<br>Seattle, WA<br>Occupation <b>ELECTRICIAN</b>           |             |             | \$250.00 | \$250.00            |
| 09/16/20      | LOGAN SWAN<br>22604 26th Ave S<br>Des Moines, WA 98198                | Corona Steel, Inc.<br>Lakewood, WA<br>Occupation <b>UNION IRONWORKER</b> |             |             | \$500.00 | \$1,000.00          |
| 09/16/20      | OSCAR VELASCO-SCHMITZ<br>4231 5th Ave NW this<br>Seattle, WA 98107    | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/16/20      | LETICIA PARKS<br>8140 Ebbert Dr SE<br>Port Orchard, WA 98367          | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/16/20      | MORRIS WHITE<br>4905 Escalon Ave<br>Los Angeles, CA 90043             | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/16/20      | SUZAN BEKIROGLU<br>5718 Camellia Ave 205<br>North Hollywood, CA 91601 | Occupation   |             |             | \$50.00  | \$50.00             |

Page Total **\$2,090.00**

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                    | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/16/20      | CALEB SILK-RICHARDSON<br>6117 PHINNEY Ave N<br>Seattle, WA 98103 | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | HANNAH BOROFF<br>2506 W oxford St<br>Philadelphia, PA 19130      | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/16/20      | FIRELIGHT HAMMERQUIST<br>1116 13th Ave<br>Seattle, WA 98122      | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | FREDERICK LANDERS<br>1420 Boren Ave Apt 309<br>Seattle, WA 98101 | Occupation   |             |             | \$20.00  | \$20.00             |
| 09/16/20      | JILLIAN MCCONE<br>12022 25th Ave NE<br>Seattle, WA 98125         | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | RANSON THOMAS<br>5115 NW 23rd Dr<br>Gainesville, FL 32605        | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/16/20      | RICHARD KEPPLER<br>930 Ireland St<br>Nashville, TN 37208         | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/16/20      | TONY WILSDON<br>17631 NE 160th Pl<br>Woodinville, WA 98072       | Retired<br>woodinville, WA<br>Occupation <b>RETIRED</b>              |             |             | \$50.00  | \$550.00            |
| 09/16/20      | NEEL JHA<br>210 Fairview Ave N<br>Seattle, WA 98109              | Microsoft<br>Redmond, WA<br>Occupation <b>SWE</b>                    |             |             | \$500.00 | \$500.00            |
| 09/16/20      | HJ DOBSON<br>1170 Harrison St Apt 407<br>Seattle, WA 98109       | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/16/20      | IAN WRIGHT<br>3008 Harvard Ave E Unit 304<br>Seattle, WA 98102   | Amazon<br>Seattle, WA<br>Occupation <b>SOFTWARE ENGINEER</b>         |             |             | \$250.00 | \$1,000.00          |

Page Total \$1,025.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                          | Contributions of more than \$100:*<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|----------|---------------------|
| 09/16/20      | VINCENT CONIGLIO<br>9455 27th Ave SW Apt 211<br>Seattle, WA 98126      | N/a<br>Seattle, WA<br>Occupation <b>N/A</b>                           |             |             | \$100.00 | \$150.00            |
| 09/16/20      | CIARA REYES<br>605 Boylston Ave E Apt. 406<br>Seattle, WA 98102        | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/16/20      | ANNAMARIE MURPHY JIWA<br>1728 Summit Ave Apt D-10<br>Seattle, WA 98122 | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/16/20      | MICHAEL MELINCHOK<br>1404 Flora Ln<br>Silver Spring, MD 20910          | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/16/20      | SEAN BUTTERFIELD<br>1505 E Harrison St #404<br>Seattle, WA 98112       | DSHS<br>Seattle, WA<br>Occupation <b>HOME CARE AIDE</b>               |             |             | \$500.00 | \$1,000.00          |
| 09/16/20      | STEVE LEIGH<br>912 17 Ave<br>Seattle, WA 98122                         | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/16/20      | ANNE FOGARTY<br>3229 37th Pl<br>Seattle, WA 98144                      | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/16/20      | LEAH PERLMUTTER<br>2408 10th Ave E Apt B<br>Seattle, WA 98102          | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/16/20      | SHIRLEY HENDERSON<br>2042 Minor Ave E<br>Seattle, WA 98102             | Squirrel Chops<br>Seattle, WA<br>Occupation <b>OWNER/MANAGER</b>      |             |             | \$500.00 | \$500.00            |
| 09/16/20      | CHRIS NORTHCROSS<br>2217 3rd Ave Apartment #602<br>Seattle, WA 98121   | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/16/20      | BRADFORD ARMSTRONG<br>2137 E 23rd St A<br>Oakland, CA 94606            | Occupation  |             |             | \$100.00 | \$100.00            |

Page Total **\$1,540.00**

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                     | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|--|-------------|-------------|----------|---------------------|
| 09/16/20      | SARAH CHAMPERNOWNE<br>103 30th Ave Unit D<br>Seattle, WA 98122    | Campfire Analytics LLC<br>Seattle, WA<br>Occupation <b>DEVELOPER</b> |             |             | \$50.00  | \$850.00            |
| 09/16/20      | PHILIP KOCH<br>71 Penny Ln<br>Baltimore, MD 21209                 | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/16/20      | DANIEL CASTRO<br>131 Bellevue Ave E Apt #103<br>Seattle, WA 98102 | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/16/20      | BRANDON SOMERVILLE<br>10737 15th Ave ne<br>Seattle, WA 98125      | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | EMILY EASTRIDGE<br>11613 Occidental Ave S<br>Seattle, WA 98168    | n/a<br>Seattle, WA<br>Occupation <b>N/A</b>                          |             |             | \$250.00 | \$250.00            |
| 09/16/20      | JACOB SLAGLE<br>414 NE 50th St<br>Seattle, WA 98105               | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/16/20      | DEVEN MURTI<br>1250 NW 120th St<br>Seattle, WA 98177              | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | MATTHEW STEWART<br>3325 Louis Rd<br>Palo Alto, CA 94303           | Unemployed<br>Palo Alto, CA<br>Occupation <b>UNEMPLOYED</b>          |             |             | \$250.00 | \$250.00            |
| 09/16/20      | ANNELIE DAY<br>2820 178th Ave NE<br>Redmond, WA 98052             | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/16/20      | WILLIAM MILLER<br>30 Westgate Pkwy #214<br>Asheville, NC 28806    | Occupation   |             |             | \$15.00  | \$25.00             |
| 09/16/20      | WILLIAM MILLER<br>30 Westgate Pkwy #214<br>Asheville, NC 28806    | Occupation   |             |             | \$10.00  | \$25.00             |

Page Total \$780.00



# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                         | Contributions of more than \$100:<br>Employer's Name, City and State          | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|---|-------------|-------------|----------|---------------------|
| 09/16/20      | LISA ARNOLD<br>915 N 36th St<br>Seattle, WA 98103                     | Occupation  |             |             | \$5.00   | \$5.00              |
| 09/16/20      | WILLIAM RAYMOND<br>11615 SE 160th St<br>Renton, WA 98058              | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | DAVID DICATO<br>301 King St Unit 900<br>San Francisco, CA 94158       | Imagine Financial<br>San Francisco, CA<br>Occupation <b>SOFTWARE ENGINEER</b> |             |             | \$500.00 | \$500.00            |
| 09/17/20      | GARIT REUBLE<br>1222 Summit Ave #205<br>Seattle, WA 98101             | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | KATHA DALTON<br>821 32nd Ave<br>Seattle, WA 98122                     | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/17/20      | JEDTSADA LAUCHAROEN<br>2506 W Oxford St<br>Philadelphia, PA 19121     | Momentum Dynamics<br>Malvern, PA<br>Occupation <b>ENGINEER</b>                |             |             | \$250.00 | \$250.00            |
| 09/17/20      | HOA DAO<br>6010 Monticello Way<br>Madison, WI 53719                   | Madison, WI<br>Occupation <b>HOMEMAKER</b>                                    |             |             | \$500.00 | \$500.00            |
| 09/17/20      | STAR WILLEY<br>2009 23rd Ave #3<br>Seattle, WA 98199                  | Starbucks<br>Seattle, WA<br>Occupation <b>BARISTA</b>                         |             |             | \$100.00 | \$200.00            |
| 09/17/20      | DAVID GOLIGHTLY<br>2001 Haste St Apt 2<br>Berkeley, CA 94704          | Occupation  |             |             | \$25.00  | \$25.00             |
| 09/17/20      | DAVID FOODEN<br>2312 E JOHN St APT 102<br>Seattle, WA 98112           | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | DOMINGO HERMOSILLO<br>510 Stevens Ave SW Apt Q304<br>Renton, WA 98057 | Occupation  |             |             | \$15.00  | \$15.00             |

Page Total **\$1,465.00**

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                                  | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | RIKKI GIBSON<br>1051 156th Ave NE<br>Bellevue, WA 98007                        | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | SUDEB MITRA<br>10719 70th Ave Apt 501<br>Forest Hills, NY 11375-4321           | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | GRIFFIN RITZE<br>2949 Kling Ave Apt 3<br>Cincinnati, OH 45211                  | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | DAVORA LINDNER<br>1100 17th Ave 406<br>Seattle, WA 98122                       | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/17/20      | DANIEL MILANO<br>NE 8th place<br>Bellevue, WA 98008                            | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | SEAN BRILEY<br>525 Bellevue Ave E apt 108<br>Seattle, WA 98102                 | Occupation   |             |             | \$30.00  | \$30.00             |
| 09/17/20      | ANTHONY DIJULIO<br>18227 Fremont Ave N<br>Shoreline, WA 98133                  | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | JOHN VALENTINE<br>1515 2nd St<br>Paonia, CO 81428                              | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | PAUL BIGMAN<br>3728 N Spaulding<br>Chicago, IL 60618                           | Occupation   |             |             | \$27.00  | \$54.00             |
| 09/17/20      | XOE AMER<br>4419 Eastern Ave N<br>Seattle, WA 98103                            | N/A<br>Seattle, WA<br>Occupation N/A                                 |             |             | \$15.00  | \$184.00            |
| 09/17/20      | ELIZABETH MEDNICK<br>1900 RITTENHOUSE Sq APT 5B<br>Philadelphia, PA 19103-6041 | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$489.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 9

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                            | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | S ROLAN ALLY<br>870 N William St<br>Baldwin, NY 11510                    | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | ALEX GRANT<br>11327 Depew Way<br>Westminster, CO 80020                   | Occupation   |             |             | \$2.70   | \$2.70              |
| 09/17/20      | BRIE RIPLEY<br>418 E Loretta Pl Apt 107<br>Seattle, WA 98102             | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | RAMY ABDEL-AZIM<br>152 Webster St 1<br>Arlington, MA 02474               | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | ANDREW GREENLEAF<br>1201 Mercer St Apt 618<br>Seattle, WA 98109          | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MICHAEL TRUMBLY<br>133 S Reeves Dr Apt A<br>Beverly Hills, CA 90212-3004 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | BRANDON GLASS<br>1120 Spring St Apt 703<br>Seattle, WA 98104             | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | ROCKY ALDRIDGE<br>1808 Bellevue Ave Apt 512<br>Seattle, WA 98122         | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | GEDNEY BARCLAY<br>11305 103rd Ave SW<br>Vashon, WA 98070                 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | JONAS GASSMANN<br>1619 Belmont Ave #301<br>Seattle, WA 98122             | Occupation   |             |             | \$27.00  | \$54.00             |
| 09/17/20      | MAHIM LAKHANI<br>312 NE 42nd St<br>Seattle, WA 98105                     | Occupation   |             |             | \$100.00 | \$100.00            |

Page Total \$429.70

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 10

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                       | Contributions of more than \$100:*<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|---|-------------|-------------|----------|---------------------|
| 09/17/20      | ROWAN ZELLERS<br>1707 Boylston Ave Apt 204<br>Seattle, WA 98122     | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | BREONA MENDOZA<br>9346 Beacon Ave S<br>Seattle, WA 98118            | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/17/20      | CRAIG S JONES<br>7920 A 32nd Ave Sw<br>Seattle, WA 98126            | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | JEREMY VOSS<br>4046A Martin Luther King Jr Way<br>Seattle, WA 98108 | Occupation  |             |             | \$18.00  | \$18.00             |
| 09/17/20      | ARRIELLE TEMPLE<br>1154 Scott Ave<br>Bremerton, WA 98310            | Occupation  |             |             | \$10.00  | \$10.00             |
| 09/17/20      | ALONZO YBARRA<br>1752 S Ferdinand St<br>Seattle, WA 98108           | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/17/20      | DANIEL STUDER<br>16240 NE 30Th St<br>Bellevue, WA 98008             | Smartsheet Inc<br>Bellevue, WA<br>Occupation SOFTWARE ENGINEER        |             |             | \$100.00 | \$150.00            |
| 09/17/20      | ZACHARY MURSTEIN<br>1415 W Lunt Ave<br>Chicago, IL 60626            | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | DANIEL ALEGRIA<br>501 Roy St Unit F330<br>Seattle, WA 98109         | ZenOptics<br>San Jose, CA<br>Occupation DESIGN MANAGER                |             |             | \$150.00 | \$150.00            |
| 09/17/20      | IAN MCCLUSKEY<br>523 N FRENCH Ave<br>Arlington, WA 98223-1218       | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | RICHARD PAULIS<br>11824 SW 236TH St<br>Vashon, WA 98070             | retired<br>retired, RE<br>Occupation RETIRED                          |             |             | \$200.00 | \$200.00            |

Page Total \$688.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                     | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|--|-------------|-------------|----------|---------------------|
| 09/17/20      | JOHN BRICKMAN<br>2024 Parkside Dr E<br>Seattle, WA 98112          | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | VALARIE PEAPHON<br>4102 N 32nd St<br>Tacoma, WA 98407             | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | AMIRAH H. ZIADA MIRZITEH<br>4823 25th Ave SW<br>Seattle, WA 98106 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | TYLER SAXON<br>1821 E Thomas St #203<br>Seattle, WA 98112         | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MARCUS STRINGER<br>6203 Fremont Ave N<br>Seattle, WA 98103        | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | LUCY FINK<br>10807 NE 39th Pl<br>Bellevue, WA 98004               | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | TYLER SICELOFF<br>1310 N 165th St<br>Seattle, WA 98133            | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | KELLEY BELD<br>611 NW 44th St<br>Seattle, WA 98107                | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | KJELL MICKELSON<br>2616 Dupont Ave S<br>Minneapolis, MN 55408     | Occupation   |             |             | \$10.00  | \$10.00             |
| 09/17/20      | WAYNE LICHTY<br>6221 5th Ave nw<br>Seattle, WA 98107              | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | CYNTHIA SHELLY<br>1300 E Mercer St<br>Seattle, WA 98102           | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$399.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 12

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | MONICA LANE<br>2361 NE Park Dr<br>Issaquah, WA 98029                 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | JOSHUA ALLEN<br>11513 Corliss Ave N<br>Seattle, WA 98133             | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | KUSH RAJ<br>717 E Denny Way<br>Seattle, WA 98122                     | Occupation   |             |             | \$25.00  | \$25.00             |
| 09/17/20      | BEN NORDLAND<br>3261 NE Bryce St<br>Portland, OR 97212               | City Portland<br>Portland, OR<br>Occupation <b>CIVIL ENGINEER</b>    |             |             | \$250.00 | \$250.00            |
| 09/17/20      | KATE LEVIN<br>3112 E Cherry St<br>Seattle, WA 98123                  | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | MARSHA BOTZER<br>PO Box 267<br>Quilcene, WA 98376                    | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | LINCOLN TURNER<br>601 Summit Ave E Apt 201<br>Seattle, WA 98102      | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | HOLLIS HIGGINS<br>427 W Cleveland<br>Spokane, WA 99205-3210          | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | TRISHA RAY<br>18838 N 36th St<br>Phoenix, AZ 85050                   | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | TODD BOHANNON<br>22433 NE Marketplace Dr H-1052<br>Redmond, WA 98053 | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | LAUREN FRYAN<br>2051 NW 29th Ave Apt 3<br>Portland, OR 97210         | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$517.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                            | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | AMARA LANG<br>1534 N Humboldt Ave #21<br>Milwaukee, WI 53202             | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | THE REVEREND ANGELA YING<br>4002 25th Ave S Seattle<br>Seattle, WA 98108 | Bethany United Church of<br>Seattle, WA<br>Occupation SENIOR PASTOR  |             |             | \$500.00 | \$500.00            |
| 09/17/20      | AREND CASTELEIN<br>105 Warren Ave N apt 302<br>Seattle, WA 98109         | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | JOHN TWENTYFIVE<br>712 N 77th St Apt. B<br>Seattle, WA 98103             | Occupation   |             |             | \$20.00  | \$20.00             |
| 09/17/20      | LIESL HENTHORN<br>2417 41st Ave E Apt 118<br>Seattle, WA 98112           | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | MATTHEW MCGOWEN<br>212 Dore St<br>San Francisco, CA 94103                | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | BOB PURCELL<br>77 S Washington<br>Seattle, WA 98104                      | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | PAUL DAY-LUCORE<br>170 S ONEIDA St<br>Denver, CO 80230                   | Occupation   |             |             | \$20.00  | \$70.00             |
| 09/17/20      | DALMEN MAYER<br>1815 14Ave #7<br>Seattle, WA 98122                       | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | ANTONIO CALLARI<br>939 Martha Ave<br>Lancaster, PA 17601                 | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | ERIC OGDEN<br>730 Redwood Ln<br>Seattle, WA 99354                        | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$863.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 14

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                          | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | KRIS HUTCHINS<br>1518 NW 52nd St Unit D<br>Seattle, WA 98107           | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | ANDREW NEPSTAD<br>10428 aqua Way s<br>Seattle, WA 98168                | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | NIILO JUNTUNEN<br>12247 12th Ave S<br>Seattle, WA 98168                | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | DAVID ELLENWOOD<br>3927 S Angel Pl<br>Seattle, WA 98118                | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | LISA SHULMAN<br>9222 22nd Ave SW<br>Seattle, WA 98106                  | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | ALEXANDER PRICE<br>12700 Greenwood Ave N Apt. 102<br>Seattle, WA 98133 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | CHRISTOPHER MORRISON<br>6212 39th Ave NE<br>Seattle, WA 98115          | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | EVAN ROSENBAUM<br>39655 Trinity Way Apt 4206<br>Fremont, CA 94538      | Occupation   |             |             | \$5.00   | \$5.00              |
| 09/17/20      | MONICA SOHL<br>633 Bergen St<br>Brooklyn, NY 11238                     | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | TAYLOR KESSNER<br>171 Boston St Apt 3<br>Seattle, WA 98109             | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MELISA BAILEY<br>1854 Main St NW<br>Elk River, MN 55330                | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$335.00



# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 15

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                    | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | JOHN GARCIA<br>505 E Denny Way #507<br>Seattle, WA 98122         | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | MATTHEW FINNELL<br>2312 3rd Ave 221<br>Seattle, WA 98121         | Occupation   |             |             | \$40.00  | \$40.00             |
| 09/17/20      | JENNA UDREN<br>920 25TH Ave<br>Seattle, WA 98122                 | Occupation   |             |             | \$48.00  | \$48.00             |
| 09/17/20      | TINA MAESTAS<br>5124 So Mead St<br>Seattle, WA 98118             | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | MARCIN ZALEWSKI<br>9206 23rd Ave NE<br>Seattle, WA 98115         | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | STEPHEN EDWARDS<br>1748 N Keeler Ave<br>Chicago, IL 60639        | Chicago, IL<br>Occupation <b>RETIRED</b>                             |             |             | \$250.00 | \$250.00            |
| 09/17/20      | ALYSSA KAUFMAN<br>3923 Wallingford Ave N<br>Seattle, WA 98103    | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | SEAN CASE<br>1027 Bellevue Ct E Apt. 505<br>Seattle, WA 98102    | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | DAVID WESTBERG<br>604 NE 165th St Apt 105<br>Shoreline, WA 98155 | Occupation   |             |             | \$22.00  | \$22.00             |
| 09/17/20      | TOM CHAMBLESS<br>117 Dora Ave<br>Bremerton, WA 98312             | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | JEREMY BLOMBERG<br>5629 11th Ave ne<br>Seattle, WA 98105         | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$671.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                             | Contributions of more than \$100:<br>Employer's Name, City and State  | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|---|-------------|-------------|----------|---------------------|
| 09/17/20      | JULIAN GANTT<br>227 12th Ave E<br>Seattle, WA 98102                       | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | CHARLES MORGAN<br>43 Columbia St<br>Brookline, MA 02446                   | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/17/20      | DUNCAN JAY<br>15772 142nd Pl SE<br>Renton, WA 98058                       | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/17/20      | STEVE PHILIPS<br>620 Lawson<br>Royal Oak, MI 48067                        | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | KENNETH FARVER<br>9609 Old Hwy 99 SE<br>Olympia, WA 98501                 | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | SETH SLAUGHTER<br>530 Broadway E apt. 609<br>Seattle, WA 98102            | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | JORDAN HENDERSON<br>712 Summit Ave E Unit 7<br>Seattle, WA 98102          | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | SHAKIRA RAMOS<br>1655 NE 181st St<br>North Miami Beach, FL 33162          | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | GRAHAM BALLARD<br>4711 45th Ave S<br>Seattle, WA 98118                    | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/17/20      | RICHARD CHCIUK<br>7861 Niles Center Rd Apartment<br>Skokie, IL 60077-2710 | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | ROBERT ROOKE<br>4827 walnut St<br>oakland, CA 94619                       | Ireland Interior Systems<br>Novato, CA<br>Occupation <b>CARPENTER</b> |             |             | \$200.00 | \$200.00            |

Page Total \$456.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

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|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/17/20      | MASUD SHAH<br>6221 5th Ave NW<br>Seattle, WA 98107                       | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | LYNNE BAJEC<br>2647 Traymore Rd<br>University Hts, OH 44118              | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | MICHAEL MALONEY<br>322 10th Ave E C3<br>Seattle, WA 98102                | OPEIU Local 8<br>Seattle, WA<br>Occupation <b>OFFICE MANAGER</b>     |             |             | \$500.00 | \$500.00            |
| 09/17/20      | TIM PRINCE<br>2440 54TH PL SW APT 4<br>Seattle, WA 98116                 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | KENNETH IZUTSU<br>3812 Burke Ave N<br>Seattle, WA 98103                  | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | STEPHEN SHUTTLEWORTH<br>248 Selby Ranch Rd Apt 4<br>Sacramento, CA 95864 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MICHAEL SCHLOSSER<br>1176 Brookside Dr<br>Eugene, OR 97405               | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/17/20      | NAYON PARK<br>500 Belmont Ave E 309<br>Seattle, WA 98102                 | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | NICOLAS GODOY<br>1860 127th Ave SE<br>Bellevue, WA 98005                 | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/17/20      | SAM SAPIRSTEIN<br>209 Bennett Ave 2C<br>New York, NY 10040               | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/17/20      | BRUCE LESNICK<br>7733 33rd Ave NW<br>Seattle, WA 98117                   | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$818.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                         | Contributions of more than \$100:<br>Employer's Name, City and State          | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|---|-------------|-------------|----------|---------------------|
| 09/17/20      | DAVID FELDMANN<br>3910 Aldrich Ave S APT 305<br>Minneapolis, MN 55409 | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | CHRIS LEONE<br>312 W 76th St #1RW<br>New York City, NY 10023          | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/17/20      | STEVEN PORTO<br>7191 W 24th Ave #62<br>Hialeah, FL 33016              | Occupation  |             |             | \$27.00  | \$42.00             |
| 09/17/20      | KENNETH TAYLOR<br>4037 22nd St<br>San Francisco, CA 94114             | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MARSHALL GORDON<br>601 E Pike St Apt 603<br>Seattle, WA 98122         | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/17/20      | MATTHEW COLASURDO<br>706 Union St #705<br>Seattle, WA 98101           | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/17/20      | ANNA SATTERTHWAITE<br>710 33rd Ave<br>Seattle, WA 98122               | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/17/20      | JULIA KOBELT<br>326 N 84th St<br>Seattle, WA 98103                    | University of Oregon<br>Eugene, OR<br>Occupation <b>LABORATORY TECHNICIAN</b> |             |             | \$27.00  | \$127.00            |
| 09/17/20      | NYREE KRIKORIAN<br>24503 77th Ave E<br>Graham, WA 98338               | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/23/20      | JIM FOX<br>975 21st Ave<br>Seattle, WA 98122                          | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/23/20      | GAGE IRVING<br>4526 S findlay St<br>seattle, WA 98118                 | Occupation  |             |             | \$100.00 | \$100.00            |

Page Total \$589.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 19

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/23/20      | PAUL BIGMAN<br>3728 N Spaulding<br>Chicago, IL 60618                 | Occupation   |             |             | \$27.00  | \$54.00             |
| 09/23/20      | SEAN BUTTERFIELD<br>1505 E Harrison St #404<br>Seattle, WA 98112     | DSHS<br>Seattle, WA<br>Occupation HOME CARE AIDE                     |             |             | \$500.00 | \$1,000.00          |
| 09/23/20      | PETER GILMORE<br>2533 Pioneer Ave Apt 7<br>Pittsburgh, PA 15226-1850 | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/23/20      | MICHAEL FOLEY<br>2 Ridgewood Rd<br>Paxton, MA 00000                  | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/23/20      | ANDREW HELWER<br>180 Jackson St NE Apt 4204<br>Atlanta, GA 30312     | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/23/20      | JUSTIN BARE<br>12508 Lake City Way NE Apt 316<br>Seattle, WA 98125   | Sincro LLC<br>Seattle, WA<br>Occupation SOFTWARE ENGINEER            |             |             | \$500.00 | \$1,000.00          |
| 09/23/20      | PAUL DAY-LUCORE<br>170 S ONEIDA St<br>Denver, CO 80230               | Occupation   |             |             | \$50.00  | \$70.00             |
| 09/23/20      | SAM SUMPTER<br>1630 Boylston Ave Apt 202<br>Seattle, WA 98122        | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/23/20      | LEONARD RIFAS<br>PO Box 45831<br>Seattle, WA 98145                   | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/23/20      | DANIEL CHILDERS<br>5725 S Kenwood Ave<br>Chicago, IL, IL 60637       | Occupation   |             |             | \$100.00 | \$100.00            |
| 09/23/20      | JAKE LUNDWALL<br>1820 E Thomas St. Apt 1<br>Seattle, WA 98112-5179   | Occupation   |             |             | \$27.00  | \$27.00             |

Page Total \$1,485.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 20

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                    | Contributions of more than \$100:<br>Employer's Name, City and State  | P<br>R<br>I | G<br>E<br>N | Amount  | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|---------|---------------------|
| 09/23/20      | BARBARA PHINNEY<br>12248 Phinney Ave N<br>Seattle, WA 98133      | Seattle, WA<br>Occupation <b>RETIRED</b>                              |             |             | \$27.00 | \$106.00            |
| 09/23/20      | JOHN MCKEON<br>21 Lake Dr<br>North Kingstown, RI 02852           | Occupation  |             |             | \$15.00 | \$65.00             |
| 09/23/20      | IAN MORRIS<br>138 NE northgate Way apt. 138<br>seattle, WA 98125 | Occupation  |             |             | \$27.00 | \$27.00             |
| 09/23/20      | DANIEL STUDER<br>16240 NE 30Th St<br>Bellevue, WA 98008          | Smartsheet Inc<br>Bellevue, WA<br>Occupation <b>SOFTWARE ENGINEER</b> |             |             | \$50.00 | \$150.00            |
| 09/23/20      | FORREST WATKINS<br>437 Bellevue Ave E<br>Seattle, WA 98102       | Occupation  |             |             | \$27.00 | \$27.00             |
| 09/23/20      | MICHAEL SHERIDAN<br>802 Boggs Ave<br>Pittsburgh, PA 15211        | Occupation  |             |             | \$15.00 | \$15.00             |
| 09/23/20      | JAN NOVA<br>1700 Harrison Ave Apt. 4C<br>Bronx, NY 10453-7093    | Occupation  |             |             | \$10.00 | \$10.00             |
| 09/23/20      | LESLIE LAKIND<br>127 Ridgecrest Dr<br>Santa Fe, NM 87505         | Occupation  |             |             | \$50.00 | \$50.00             |
| 09/23/20      | DAVE GARIBALDI<br>12 6th St NE #104<br>Osseo, MN 55369           | Occupation  |             |             | \$27.00 | \$27.00             |
| 09/23/20      | JOSHUA FEINTUCH<br>341 EASTERN Pkwy APT 2A<br>Brooklyn, NY 11216 | Occupation  |             |             | \$27.00 | \$27.00             |
| 09/23/20      | JOSEPHINE HARRIS<br>1242 16th Ave E<br>Seattle, WA 98112         | Occupation  |             |             | \$50.00 | \$50.00             |

Page Total \$325.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 21

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:*<br>Employer's Name, City and State           | P<br>R<br>I | G<br>E<br>N | Amount     | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|------------|---------------------|
| 09/23/20      | LOGAN SWAN<br>22604 26th Ave S<br>Des Moines, WA 98198               | Corona Steel, Inc.<br>Lakewood, WA<br>Occupation <b>UNION IRONWORKER</b>        |             |             | \$500.00   | \$1,000.00          |
| 09/23/20      | DAN OLSON<br>669 Hillsborough St Apt 31<br>Oakland, CA 94606         | Occupation  |             |             | \$5.00     | \$5.00              |
| 09/23/20      | LARISSA CHUPRINA<br>13020 102nd Ln NE #6<br>Kirkland, WA 98034       | Occupation  |             |             | \$15.00    | \$15.00             |
| 09/23/20      | STAN PARKER<br>2520 Jefferson St<br>Bellingham, WA 98225             | Occupation  |             |             | \$27.00    | \$77.00             |
| 09/23/20      | GLEN WOLF<br>700 S water St<br>silverton, OR 97381                   | Occupation  |             |             | \$27.00    | \$27.00             |
| 09/23/20      | IAN WRIGHT<br>3008 Harvard Ave E Unit 304<br>Seattle, WA 98102       | Amazon<br>Seattle, WA<br>Occupation <b>SOFTWARE ENGINEER</b>                    |             |             | \$700.00   | \$1,000.00          |
| 09/23/20      | PRESTON SAHABU<br>4343 Roosevelt Way NE Apt 403<br>Seattle, WA 98105 | University of Washington<br>Seattle, WA<br>Occupation <b>RESEARCH ASSISTANT</b> |             |             | \$1,000.00 | \$1,000.00          |
| 09/23/20      | KAREN WILSON<br>302 105TH St E<br>Tacoma, WA 98445                   | Occupation  |             |             | \$100.00   | \$100.00            |
| 09/23/20      | DOUGLAS SPOONER<br>17530 10th Ave NW<br>Shoreline, WA 98177          | Occupation  |             |             | \$100.00   | \$100.00            |
| 09/23/20      | DANIEL SWANSON<br>6402 9th Ave NE<br>Seattle, WA 98115               | Swansons Shoe Repair<br>seattle, WA<br>Occupation <b>COBBLER</b>                |             |             | \$900.00   | \$1,000.00          |
| 09/23/20      | BRENDAN MCGOVERN<br>414 NE 50th St<br>Seattle, WA 98105              | Off the Wall School of Music<br>Seattle, WA<br>Occupation <b>MUSIC TEACHER</b>  |             |             | \$1,000.00 | \$1,000.00          |

Page Total \$4,374.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 22

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                      | Contributions of more than \$100:<br>Employer's Name, City and State          | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|----------|---------------------|
| 09/23/20      | DAKOTA BENNETT<br>12508 Lake City Way NE #316<br>Seattle, WA 98125 | University of Washington<br>Seattle, WA<br>Occupation <b>EDUCATOR</b>         |             |             | \$250.00 | \$250.00            |
| 09/23/20      | ALYCIA LEWIS<br>1015 Taylor Ave N<br>Seattle, WA 98109             | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/23/20      | SARAH CHAMPERNOWNE<br>103 30th Ave Unit D<br>Seattle, WA 98122     | Campfire Analytics LLC<br>Seattle, WA<br>Occupation <b>DEVELOPER</b>          |             |             | \$800.00 | \$850.00            |
| 09/23/20      | NICHOLAS JONES<br>6420 Beacon Ave S<br>Seattle, WA 98108           | City of Seattle<br>Seattle, WA<br>Occupation <b>LEGISLATIVE ASSISTANT</b>     |             |             | \$250.00 | \$250.00            |
| 09/23/20      | ERNEST CONRADS<br>6420 Beacon Ave S<br>Seattle, WA 98108           | USPS<br>Seattle, WA<br>Occupation <b>MAIL CARRIER</b>                         |             |             | \$500.00 | \$500.00            |
| 09/23/20      | CALVIN PRIEST<br>112 28th Ave S<br>Seattle, WA 98144               | Socialist Alternative<br>Seattle, WA<br>Occupation <b>POLITICAL ORGANIZER</b> |             |             | \$250.00 | \$250.00            |
| 09/23/20      | TRAVIS LANE<br>1015 Taylor Ave n<br>Seattle, WA 98109              | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | STAR WILLEY<br>2009 23rd Ave #3<br>Seattle, WA 98199               | Starbucks<br>Seattle, WA<br>Occupation <b>BARISTA</b>                         |             |             | \$100.00 | \$200.00            |
| 09/23/20      | GWENDOLYN HART<br>115 Warren Ave N<br>Seattle, WA 98109            | Hardsuit Labs<br>Seattle, WA<br>Occupation <b>SOFTWARE ENGINEER</b>           |             |             | \$250.00 | \$250.00            |
| 09/23/20      | ROBERT AMZI JEFFS<br>6412 14th Ave NW<br>Seattle, WA 98107         | University of Washington<br>Seattle, WA<br>Occupation <b>GRADUATE STUDENT</b> |             |             | \$500.00 | \$500.00            |
| 09/23/20      | GABRIEL MAHAN<br>317 Harvard Ave E APT 206<br>Seattle, WA 98102    | Zearn, inc.<br>New York, NY<br>Occupation <b>SOFTWARE ENGINEER</b>            |             |             | \$250.00 | \$407.00            |

Page Total \$3,300.00



# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 23

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                     | Contributions of more than \$100:*<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|---|---|-------------|-------------|----------|---------------------|
| 09/23/20      | EVA METZ<br>3654 S ANDOVER St Unit B<br>Seattle, WA 98118-1122    | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | CHARITY RANGER<br>1505 E Harrison St APT 404<br>Seattle, WA 98112 | N/A<br>Seattle, WA<br>Occupation N/A                                  |             |             | \$500.00 | \$500.00            |
| 09/23/20      | ABIGAIL TANNER<br>1020 NE 125th St Apt 17<br>Seattle, WA 98125    | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/23/20      | KAILYN NICHOLSON<br>12018 Sand Point Way NE<br>Seattle, WA 98125  | dba Kailyn Nicholson<br>Seattle, WA<br>Occupation ORGANIZER           |             |             | \$100.00 | \$150.00            |
| 09/23/20      | MATTHEW MALEY<br>103 30th Ave Apt D<br>Seattle, WA 98122          | seattle public schools<br>Seattle, WA<br>Occupation TEACHER           |             |             | \$200.00 | \$200.00            |
| 09/23/20      | XOE AMER<br>4419 Eastern Ave N<br>Seattle, WA 98103               | N/A<br>Seattle, WA<br>Occupation N/A                                  |             |             | \$169.00 | \$184.00            |
| 09/23/20      | OLIVER HOIDN<br>120 10th Ave<br>Seattle, WA 98102                 | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | GABRIEL PELLY<br>802 NE 40th St<br>Seattle, WA 98105              | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | SASHA SOMER<br>2401 E Spring St<br>Seattle, WA 98122              | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | NSHAN BURNS<br>24503 77th Ave E<br>Graham, WA 98338               | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/23/20      | TONY WILSDON<br>17631 NE 160th Pl<br>Woodinville, WA 98072        | Retired<br>woodinville, WA<br>Occupation RETIRED                      |             |             | \$500.00 | \$550.00            |

Page Total \$1,946.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 24

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                  | Contributions of more than \$100:<br>Employer's Name, City and State          | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|----------|---------------------|
| 09/23/20      | SARAH PAINTER<br>901 6th Ave Apt 104<br>Seattle, WA 98104      | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/23/20      | NIKHIL SHIMPI<br>14710 Carrolton Rd<br>Rockville, MD 20853     | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/23/20      | SHYAM THIMMAIAH<br>1730 22nd Ave APT W411<br>Seattle, WA 98122 | Occupation  |             |             | \$50.00  | \$50.00             |
| 09/23/20      | SARAH STEGNER<br>4827 48 SW<br>Seattle, WA 98116               | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/23/20      | SHAUN WERNER<br>2403 W Heather Ln<br>Hanford, CA 93230-7078    | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/23/20      | LUIS ALVAREZ<br>940 N 98th St 408<br>Seattle, WA 98103         | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | JONAS GASSMANN<br>1619 Belmont Ave #301<br>Seattle, WA 98122   | Occupation  |             |             | \$27.00  | \$54.00             |
| 09/23/20      | EDWARD FERRY<br>669 S King St #424<br>Seattle, WA 98104        | Occupation  |             |             | \$15.00  | \$15.00             |
| 09/23/20      | HAMOON DAGHIGH<br>4017 Woodlawn Ave. N<br>Seattle, WA 98103    | Occupation  |             |             | \$20.00  | \$20.00             |
| 09/23/20      | HENRY SCHWARZ<br>2124 TUNLAW Rd NW<br>Washington, DC 20007     | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/23/20      | JULIA KOBELT<br>326 N 84th St<br>Seattle, WA 98103             | University of Oregon<br>Eugene, OR<br>Occupation <b>LABORATORY TECHNICIAN</b> |             |             | \$100.00 | \$127.00            |

Page Total \$531.00

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 25

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

**Kshama Solidarity Campaign**

Deposit Date

**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:<br>Employer's Name, City and State           | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|--|-------------|-------------|----------|---------------------|
| 09/23/20      | ELAINE NONNEMAN<br>226 21st Ave E<br>Seattle, WA 98112               | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/24/20      | YUJI MORIKI<br>71 Ocean Pkwy #3E<br>Brooklyn, NY 11218               | Occupation   |             |             | \$15.00  | \$15.00             |
| 09/24/20      | LUIS KELLY<br>50 Maynard St # 127<br>Attleboro, MA 00000             | Occupation   |             |             | \$15.01  | \$15.01             |
| 09/24/20      | JERRY SKINNER<br>1741 N Natoma Ave<br>Chicago, IL 60707              | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/24/20      | ALLIE N STEVE MULLEN<br>3932 N Mozart St Apt 1F<br>Chicago, IL 60618 | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/24/20      | GABRIEL FOCKLER<br>2954 f St Apartment 5<br>San Diego, CA 92102      | Occupation   |             |             | \$5.00   | \$5.00              |
| 09/24/20      | JAKE KOENIGSBERG<br>806 19th Ave<br>Seattle, WA 98122                | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/24/20      | SUE MOON<br>1300 Lake Washington Blvd S<br>Seattle, WA 98144         | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/24/20      | DAVID BRANDT<br>225 Adams St<br>Brooklyn, NY 11201                   | Occupation   |             |             | \$27.00  | \$27.00             |
| 09/24/20      | ROLAND MULLOCK<br>1525 14th Ave Unit 318<br>Seattle, WA 98122        | Occupation   |             |             | \$50.00  | \$50.00             |
| 09/24/20      | SARAH CHANG<br>220 N Avenue 54<br>Los Angeles, CA 90042-4106         | Social Justice Learning<br>Inglewood, CA<br>Occupation <b>PROGRAM DIRECTOR</b> |             |             | \$500.00 | \$500.00            |

Page Total \$793.01

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 26

Candidate or Committee Name (Do not abbreviate. Use full name.)  
**Kshama Solidarity Campaign**

Deposit Date  
**09/28/20**

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                          | Contributions of more than \$100:*<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount   | Aggregate<br>Total* |
|---------------|--|---|-------------|-------------|----------|---------------------|
| 09/24/20      | JANET CARTER<br>4008 39th Ave SW<br>Seattle, WA 98116                  | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/24/20      | VINCENT CONIGLIO<br>9455 27th Ave SW Apt 211<br>Seattle, WA 98126      | N/a<br>Seattle, WA<br>Occupation N/A                                  |             |             | \$50.00  | \$150.00            |
| 09/24/20      | EMILY MCARTHUR<br>6420 Beacon Ave S<br>Seattle, WA 98108               | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/24/20      | ANTHONY ALLEN<br>1821 S Jackson St Apt 77A<br>San Angelo, TX 76904     | Occupation  |             |             | \$5.00   | \$5.00              |
| 09/24/20      | GABRIEL DINO<br>3440 E Ransom St Apartment 203<br>Long Beach, CA 30804 | Occupation  |             |             | \$10.00  | \$10.00             |
| 09/24/20      | JACOB MCCARTHY<br>807 E Allison St 2<br>Seattle, WA 98102              | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/24/20      | LOU NICHOLS<br>2452 E Overview Ln<br>Green Valley, AZ 95614            | Occupation  |             |             | \$100.00 | \$100.00            |
| 09/24/20      | ELLEN MCCAULEY<br>2100 Electric Ave #122<br>Bellingham, WA 98229       | Occupation  |             |             | \$27.00  | \$27.00             |
| 09/24/20      | STEVEN PORTO<br>7191 W 24th Ave #62<br>Hialeah, FL 33016               | Occupation  |             |             | \$15.00  | \$42.00             |
|               |  | Occupation  |             |             |          |                     |
|               |  | Occupation  |             |             |          |                     |

Page Total \$434.00

## Text Page Attachment

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Name Kshama Solidarity Campaign

\$29,297.71 Donations via NB \$100.00 Refunds \$1,513.92 Fees \$27,683.79 Actual Deposit



Prev: [Group calls on city to immediately 'safely...' \(10/12/20\)](#) | Next: [King County raises sales tax in plan to create... \(10/14/20\)](#)

## Kshama Solidarity campaign raises recall fight

Posted on [Tuesday, October 13, 2020 - 12:30 pm](#) by [jseattle](#)

The **City of Seattle** is [covering the legal costs](#) in **Kshama Sawant's** fight against a recall campaign. The incredibly popular socialist leader's fans — most also Seattle taxpayers — are giving to the cause, too.

"We've set a goal of raising \$100,000 by October 31st, the end of our first full month of fundraising," the pitch for the **Kshama Solidarity** fund reads:

*We need to make abundantly clear to our opposition that working people won't stand by while our movement is under threat. Defending Kshama's city council seat is critical for continuing to build the movement to defund the Seattle Police Department by at least 50%, to win progressive funding for community programs and affordable housing, for community oversight and control of the police, and for working people to continue to have our voice in City Hall.*

[Kshamasolidarity.org](#) shows more than \$80,000 has already been raised.

The Sawant fundraising effort officially registered with the **Seattle Ethics and Elections Commission** last week with an opening filing of nearly \$30,000 in donations — most in amounts of around \$150 or less, and most from people listing Seattle addresses.

More robust breakdowns will be available in subsequent weeks as the campaign files additional reports.

The Kshama Solidarity giving options begin at \$15 — a number symbolically important to Sawant supporters in the minimum wage fight — and \$27, above the threshold that allows a donation to be reported anonymously.

The **Recall Sawant** group pushing for a ballot vote on removing the three-term **Seattle City Councilmember** from office has raised \$123,000 so far, according to official filings. Those donations continue to be dominated by contributions of \$25 or under meaning donor information remains anonymous.

"To be successful in the age of COVID-19, we need the financial support of thousands of small contributors just like you because sending petitions by mail will be expensive," the pitch at [recallsawant2020.org](#) reads. "We only have a limited time to gather signatures so please

make a donate as soon as possible.”

Both campaigns may have a wait before any signature gathering or on the street outreach efforts begin. Sawant’s legal team has filed to appeal the decision allowing the recall campaign to go forward [to the state Supreme Court](#).

## Donate

We’ve set a goal of raising **\$100,000 by October 31st**, the end of our first full month of fundraising. We need to make abundantly clear to our opposition that working people won’t stand by while our movement is under threat. Defending Kshama’s city council seat is critical for continuing to build the movement to defund the Seattle Police Department by at least 50%, to win progressive funding for community programs and affordable housing, for community oversight and control of the police, and for working people to continue to have our voice in City Hall.

**\$80,351.00** raised of a \$100,000.00 goal



### 1. Amount

\$15

\$27

\$50

\$100

\$250

\$500

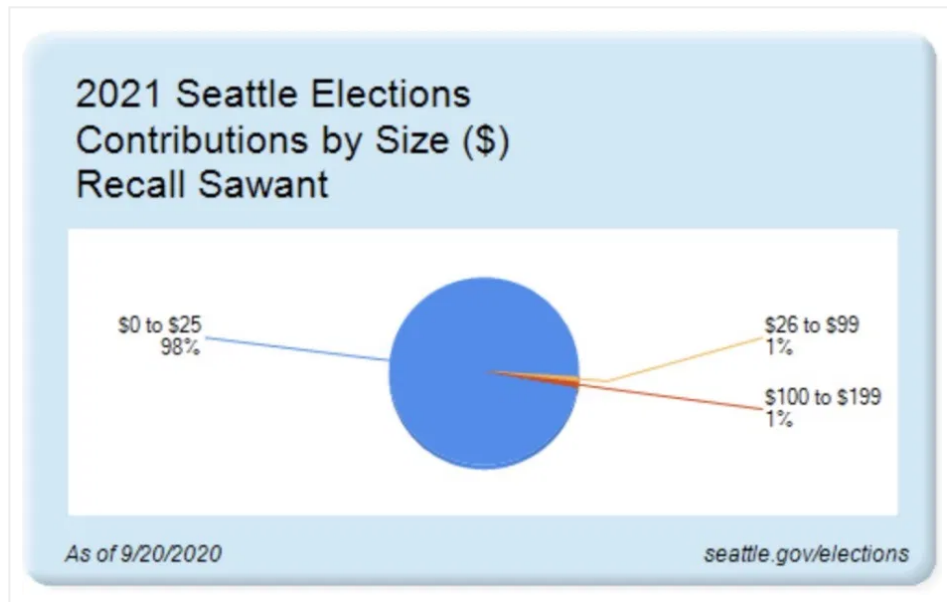
\$1,000

Other

\$ 27.00

One-time

Monthly



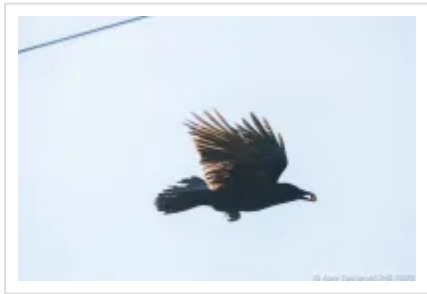
- 98% of the money donated to the Recall Sawant campaign so far has come from donations of \$25 or less





Morning Update Show | October 13, 2020

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'Kshama Solidarity Rally' planned for courthouse to oppose Sawant recall petition -- UPDATE

Thursday, September 10, 2020 - 7:00 am  
In "News, etc."

## Her Seat and Fight on to Defund SPD and Cancel Rent

From Socialist Alternative Hundreds of supporters rallied in support of Councilmember Sawant. Watch Councilmember Sawant's speech here. Today, over 300 supporters joined online Wednesday, September 16, 2020 - 6:39 pm  
In "Community"

From Mike Andrew UAW 1981/National Writers Union We're proud to be leaders and rank-and-file activists in the 14 unions and counting that have endorsed Kshama Sawant's campaign for re- Thursday, June 27, 2019 - 9:20 am  
In "Community"

This entry was posted in [News, etc.](#) and tagged [courts](#), [district 3](#), [elections](#), [politics](#) by [jseattle](#). Bookmark the [permalink](#) [<https://www.capitolhillseattle.com/2020/10/kshama-solidarity-campaign-raising-thousands-in-recall-fight/>].



### About jseattle

Justin is publisher of CHS. You can reach him at [chs@capitolhillseattle.com](mailto:chs@capitolhillseattle.com) or call/txt (206) 399-5959. Follow [@jseattle](#) on Twitter or be [best pals](#) on Facebook.

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20 THOUGHTS ON "KSHAMA SOLIDARITY CAMPAIGN RAISING THOUSANDS IN RECALL FIGHT" -- ALL CHS COMMENTS ARE HELD FOR MODERATION BEFORE PUBLISHING

Tom in CD

on [Tuesday, October 13, 2020 - 12:36 pm](#) said:

Go back to your mansion Sawant.

**Mimi**on [Tuesday, October 13, 2020 - 12:49 pm](#) said:

People who still support her are like Trump supporters who blindly support him when he clearly doesn't act on behalf of their interests.

**Remove sawant**on [Tuesday, October 13, 2020 - 4:39 pm](#) said:

Yep. They are both despicable in their own way but Sawant has truly impacted my everyday life and made this city far, far worse in pursuit of her ideological goals.

**LetsGo**on [Thursday, October 15, 2020 - 8:50 pm](#) said:

I would argue Savant has impacted me more negatively than Trump. Nearly as knee-jerky and corrupt. She has to go

**Glenn**on [Tuesday, October 13, 2020 - 4:36 pm](#) said:

"The incredibly popular Socialist leader"? How can she be described as incredibly popular when she squeaked out a win last election by about four percentage points- less than the margin of many other Seattle Council elections? She is not incredibly popular. She is just popular enough in her district to get elected, which is not the same thing. And why is she raising money when her legal fees are being covered by Seattle taxpayers?

**David**on [Tuesday, October 13, 2020 - 5:37 pm](#) said:

She is raising money because she is probably planning on actually having to run a campaign to convince people to vote against her recall, which will require ads and signs and posters, etc, which are expensive and will not be covered by the city (I would assume)

**drshort**

on [Wednesday, October 14, 2020 - 9:23 am](#) said:

Sawant's campaigns are also good income generators for herself and her friends at Socialist Alternative.

For instance, an inquisitive journalist might want to ask why Sawant's husband and others at Socialist Alternative are still collecting paychecks from the Tax Amazon campaign months after it effectively ended. The deadline for for submitting signatures was early July, yet yesterday's campaign filing shows people still collecting paychecks. For what? Are they going to keep paying themselves until they drain the balance to zero?

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=101006883>

**Andrew**

on [Tuesday, October 13, 2020 - 6:19 pm](#) said:

Yes, right at the outset the journalist reveals their personal agenda and makes me call into question everything that follows.

**dddan**

on [Tuesday, October 13, 2020 - 8:27 pm](#) said:

She's "incredibly popular" with the writer of this article, but not many others.

**GregM**

on [Tuesday, October 13, 2020 - 10:45 pm](#) said:

Never let a crisis go to waste.

**RWK**

on [Wednesday, October 14, 2020 - 5:30 am](#) said:

I was going to make the same points, but you did it for me.

“incredibly popular”? NOT!!

**Jules Constance**

on [Thursday, October 15, 2020 - 10:07 pm](#) said:

“Incredibly popular” is a perfectly accurate descriptor. How many city council members have supporters from across the country? Exactly one: Sawant. I live in North Carolina and I’ve been following Sawant and supporting her for years. For a city council member her popularity is unprecedented.

**McCloud**

on [Tuesday, October 13, 2020 - 5:08 pm](#) said:

For a self-proclaimed Socialist, she’s pretty damned expensive to keep around, both for Seattle taxpayers and her D3 constituents, evidently.

You’d think someone like that would come at a steep discount, compared to the ruling class oligarchs she’s made it her life’s work to fight against. You know, the ones that shield themselves in a sphere of money, deflecting substantive litigation and recall efforts that aim to keep their powers in check.

Actual irony.

**Cap hill no no**

on [Tuesday, October 13, 2020 - 9:32 pm](#) said:

Great first step to cleaning house.

**CD Resident for 20 years**

on [Wednesday, October 14, 2020 - 8:09 am](#) said:

I love and support Sawant. I was super impressed by her standing up to Durkan and the SPD. She has my vote and will continue to have my vote.

**Patrick Bateman**

on [Friday, October 16, 2020 - 12:28 am](#) said:

I agree with you; Sawant's the best! I also liked Joseph Stalin and Pol Pot.

**Kim**

on [Wednesday, October 14, 2020 - 8:40 am](#) said:

The phrase "incredibly popular" is best read in the voice of the North Korean news anchor lady.

**Simon**

on [Wednesday, October 14, 2020 - 8:45 am](#) said:

“incredibly popular” ???! is there even an ounce integrity left in the press? I would expect this form of yellow journalism nonsense from the likes of Fox, but seeing it from a liberal outpost is disheartening. If we criticize the right for their shortcomings let us at the very least set a good example.

Or at the very least preface it by saying “OPINION PIECE”...having said that I love your site and you do a fantastic job reporting on local businesses and fauna :)

**Tina**

on [Thursday, October 15, 2020 - 10:43 am](#) said:

<https://recallsawant2020.org/>

Sawant anti-business motivations are threatening to ruin Seattle economic and once peaceful city. Sign the petition, and spread the word to everyone.

Seattle City Council last month pledged \$75,000 of OUR taxpayer money for her court fees against the recall campaign? That money could of been used for helping Small businesses, but no. Don't let Seattle become the next Portland where businesses are closing left and right from the violence.

**Ele4phant**

on [Thursday, October 15, 2020 - 5:45 pm](#) said:

I think by incredibly popular what you mean is incredibly high profile and polarizing.

Her name ID is insane for a city council member and people have very strong feelings about her, in both directions.

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6 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

7 ONEAMERICA VOTES, a Washington  
8 Nonprofit; ONEAMERICA, a Washington  
9 Nonprofit; LOCAL #4121, INTERNATIONAL  
10 UNION, UNITED AUTOMOBILE,  
11 AEROSPACE, AND AGRICULTURAL  
IMPLEMENT WORKERS OF AMERICA, a  
labor organization; MUDIT KAKAR, an  
individual; VIRGINIA FLORES, an individual;  
and NAYON PARK, an individual,

12 Plaintiffs,

13 v.

14  
15 STATE OF WASHINGTON, a political  
16 subdivision; WASHINGTON STATE  
17 ATTORNEY GENERAL'S OFFICE, an  
18 executive department; BOB FERGUSON, in his  
19 official capacity as Attorney General;  
WASHINGTON STATE PUBLIC  
DISCLOSURE COMMISSION, a state agency;  
and PETER LAVALLEE, in his official capacity  
as Executive Director of the PDC,

20 Defendants.

No.

**COMPLAINT**

21 **I. INTRODUCTION**

22 Earlier this year, the Washington Legislature enacted a law that, while purporting to  
23 combat "foreign influence" in state and local elections, in fact curtails the free speech rights of  
24



1 both foreign-born residents of Washington and the citizens with whom they choose to associate.  
2 The law, Substitute Senate Bill 6152 (SSB 6152), declares that core free speech and association  
3 rights are reserved only for citizens and lawful permanent residents, while branding all other  
4 Washington residents—including lawful temporary residents, refugees, asylees, and  
5 undocumented immigrants—“foreign nationals” who are deprived of these rights. The law goes  
6 on to not only prohibit so-called “foreign nationals” from contributing to candidate campaigns  
7 and ballot initiatives, but bar citizens and lawful permanent residents from even “involving”  
8 “foreign nationals” in decisions on campaign finance contributions and expenditures “in any  
9 way.”

10 If enforced, SSB 6152 will have a dramatic and disastrous effect on the political  
11 discourse in Washington. On information and belief, there are approximately half a million  
12 residents of this state who will be classed as “foreign nationals.” Each of them is subject to state  
13 and local laws and has a legitimate interest in influencing public policy through the electoral  
14 process. They do this by making financial contributions where allowed under federal law and by  
15 assisting political organizations in determining what candidates and ballot measures to support or  
16 oppose. Indeed, many of these individuals are currently members, employees, or officers of  
17 political organizations and participate in deciding those organizations’ campaign finance  
18 priorities. SSB 6152 will silence these individuals’ voices and deprive their colleagues of  
19 important input. The Washington Constitution does not tolerate this result.

20 The Plaintiffs in this case are three organizations that engage in political activities in  
21 Washington, as well as three “foreign nationals” who serve as their officers or leaders. They  
22 bring this action pursuant to the Declaratory Judgment Act, RCW 7.24, *et seq.*, in order to strike  
23  
24

1 down SSB 6152 as unconstitutional and thereby restore the political voices of all  
2 Washingtonians.

## 3 **II. PARTIES, JURISDICTION AND VENUE**

4 1.1 Plaintiff OneAmerica Votes (OAV) is a Washington non-profit organization with offices  
5 located at 1225 S. Weller Street, Suite 430, Seattle, WA 98144. It is registered with the IRS as a  
6 501(c)(4) organization.

7 1.2 Plaintiff OneAmerica (OA) is a Washington non-profit organization with offices also  
8 located at 1225 S. Weller Street, Suite 430, Seattle, WA 98144. It is registered with the IRS as a  
9 501(c)(3) organization.

10 1.3 Plaintiff Local #4121, International Union, United Automobile, Aerospace, and  
11 Agricultural Implement Workers of America (Local 4121) is an unincorporated labor  
12 organization with an office and union hall located at 2633 Eastlake Ave E., Suite 200, Seattle,  
13 WA 98102. It is registered with the IRS as a 501(c)(5) organization.

14 1.4 Plaintiff Mudit Kakar is a citizen of India and lawful H-1B visa-holder who resides in  
15 Seattle, Washington. Mr. Kakar is a member of OA's Board of Directors and chairs the  
16 organization's fundraising and development committee.

17 1.5 Plaintiff Virginia Flores is a citizen of Mexico and undocumented immigrant who resides  
18 in Vancouver, Washington. Ms. Flores is a member of OA and its Grassroots Leadership  
19 Council. Ms. Flores is also a participant in OA's community leaders fellowship program.

20 1.6 Plaintiff Nayon Park is a citizen of South Korea and lawful F-1 visa holder who resides in  
21 Seattle, Washington. Ms. Park is a member of and steward for Local 4121. She also serves on the  
22 union's Joint Council as a Head Steward.

23 1.7 Defendant State of Washington (State) is a state and political subdivision of the United  
24 States of America.

1 1.8 Defendant Washington State Attorney General's Office (AGO) is an executive  
2 department of the State and is responsible for representing the State's interest in legal  
3 proceedings and enforcing certain State laws.

4 1.9 Defendant Bob Ferguson is the Attorney General and is named a defendant solely in his  
5 official capacity as such.

6 1.10 Defendant Washington State Public Disclosure Commission (PDC) is a State agency and  
7 is responsible for enforcing the Fair Campaign Practices Act.

8 1.11 Defendant Peter Lavallee is the Executive Director of the PDC and is named a defendant  
9 solely in his official capacity as such.

10 1.12 Jurisdiction of this Court arises pursuant to RCW 2.08.010 and the Washington  
11 Declaratory Judgment Act, Chapter 7.24 RCW.

12 1.13 Venue lies in this Court pursuant to RCW 4.92.010(1).

### 13 **III.STATEMENT OF FACTS**

#### 14 **A. Temporary Resident Aliens, Refugees, Asylees, and Undocumented Immigrants, as** 15 **well as the Organizations with Which They Associate, Engage in Lawful Political** 16 **Activity in Washington.**

17 2.1 Washington's resident population is composed not only of citizens and lawful permanent  
18 residents, but also temporary resident aliens, refugees, asylees, and undocumented immigrants.

19 2.2 Upon information and belief, at least 250,000 temporary resident aliens, who are issued  
20 visas by the United States Citizenship and Immigrations Service (USCIS), currently reside in  
21 Washington.

22 2.3 Upon information and belief, between 2010 and 2020, at least 24,000 refugees have  
23 settled in Washington, many of whom have not yet sought or obtained permanent residency  
24 status.

1 2.4 Upon information and belief, between 2016 and 2020, at least 1,000 asylees have settled  
2 in Washington, many of whom have not yet sought or obtained permanent residency status.

3 2.5 Upon information and belief, approximately 229,000 undocumented immigrants,  
4 including many enrolled in the Deferred Action for Childhood Arrivals (DACA) program,  
5 currently reside in Washington.

6 2.6 As residents of Washington, the foregoing classes of individuals are subject to  
7 Washington's statutes, regulations, and policies, as well as the ordinances of the Washington  
8 counties, municipalities, and other local governmental subdivisions in which they live. They are  
9 also subject to sales, property, and other taxes, and various forms of assessments imposed by the  
10 State and its political subdivisions. These laws, taxes, and assessments arise through the  
11 enactments of elected officials and ballot measures. Thus, temporary resident aliens, refugees,  
12 asylees, and undocumented immigrants have a legitimate interest in ensuring that candidates for  
13 elected office and ballot measure proposals are responsive to their interests and concerns.

14 2.7 Given this legitimate interest, many temporary resident aliens, refugees, asylees, and  
15 undocumented immigrants who live in Washington participate in political organizations that  
16 promote candidates and ballot initiatives which advance the rights of immigrants and non-  
17 citizens.

18 2.8 OA, OAV, and UAW Local 4121 are three such organizations that work to protect the  
19 rights of immigrants and non-citizens, among others, in Washington.

20 2.9 OA's mission is to advance the fundamental principles of democracy and justice at the  
21 local, state, and national levels by building power within immigrant communities in  
22 collaboration with key allies. The organization is overseen by a Board of Directors and has a  
23 staff of 30 employees led by an Executive Director. In order to effectuate its mission, OA makes  
24

1 contributions to ballot measure committees and independent expenditures concerning ballot  
2 measures campaigns that are of interest to the immigrant/non-citizen community. Following  
3 consultation with the Executive Director, OA's Board of Directors makes the ultimate decision  
4 of which ballot initiatives to support or oppose. Once the Board makes these decisions, OA staff  
5 determines the precise means of support or opposition and the amount of money to allocate for  
6 these purposes.

7 2.10 Similar to OA, OAV's mission is to promote democracy and build power in immigrant  
8 and non-citizen communities through advocacy, civic engagement and leadership development.  
9 It is overseen by its own Board of Directors and, by agreement, shares OA's staff and resources.  
10 OAV administers the Justice Fund, a Washington political committee that makes contributions to  
11 and expenditures on behalf of candidates for state and local elected office who OAV determines  
12 will advance the interests of the immigrant community. The Justice Fund also makes  
13 independent expenditures in support of or opposition to state and local candidates. The Fund is  
14 governed by six members of OAV's Board of Directors, together with the chairs of policy-  
15 specific committees.

16 2.11 In addition, OA and OAV share a Grassroots Leadership Council (GRLC), an advisory  
17 body which consults the two Boards of Directors and which is composed of leaders among OA's  
18 and OAV's grassroots members located across the state of Washington. The GRLC is  
19 responsible for shaping OA's and OAV's political strategy. The GRLC is particularly involved  
20 in developing OAV's electoral strategy because its members conduct endorsement interviews  
21 with candidates and make endorsement recommendations to the OAV Board of Directors, which  
22 the Board then discusses and, where appropriate, approves. Once the GRLC and OAV Board  
23 make these decisions, the Justice Fund directors determine the precise means of support and the  
24

1 amount of money to allocate for endorsed candidates. Likewise, the GRLC gives advice and  
2 makes recommendations to OA staff and its Board of Directors concerning ballot initiatives to  
3 support or oppose. The GRLC also serves as a pipeline preparing grassroots leaders among OA's  
4 members to serve on the OA and OAV Boards of Directors.

5 2.12 In addition to the foregoing GRLC consultation process, OA and OAV staff and Board  
6 members also consult informally with OA members across Washington to receive input about  
7 which candidates and ballot measures the organizations should support or oppose.

8 2.13 OA and OAV solicit donations from all supporters and members, regardless of their  
9 citizenship status. It is against OA's and OAV's policy to specifically request and track its  
10 supporters' immigration status.

11 2.14 Immigrants and non-citizens themselves are among the leaders of OA and OAV and are  
12 deeply involved in both groups' political activities and campaign finance decisions. A significant  
13 proportion of the GRLC's members are temporary resident aliens, refugees, asylees, or  
14 undocumented immigrants. The OA and OAV staff and Boards of Directors also include non-  
15 permanent residents.

16 2.15 By way of example, Plaintiff Mudit Kakar has served on OA's Board of Directors since  
17 February 2017 and has chaired the Board's fundraising and development committee since  
18 January 2020. Mr. Kakar, a citizen of India, is an H-1B visa holder. He has lived in the United  
19 States since 2003, when he arrived under an F-1 student visa to enroll in a pharmaceuticals Ph.D.  
20 program at the University of Utah. After receiving his Ph.D. in 2008, Mr. Kakar enrolled in the  
21 University of Washington School of Law and obtained his JD from that institution in 2011. He  
22 was admitted to the Washington State Bar the same year. Since that time, Mr. Kakar has worked  
23 as a patent litigator at the law firms of Dorsey & Whitney, LLP, and K & L Gates, LLP at their  
24

1 Seattle offices. Currently, he works at the Seattle-based law firm of Choi Capital Law, PLLC.  
2 Mr. Kakar resides in Seattle and has purchased a house there.

3 2.16 Beyond his professional work and service on OA's Board of Directors, Mr. Kakar has  
4 volunteered for QLaw, the American Civil Liberties Union, and the Northwest Immigrant Rights  
5 Project. He has also served on the Board of Directors of the South Asian Bar Association of  
6 Washington and the Washington Initiative for Diversity.

7 2.17 In his capacity as a member of OA's Board of Directors, Mr. Kakar is, together with his  
8 Board colleagues, charged with reviewing OA's budget and finances to ensure that the  
9 organization's funds are being used in a responsible and impactful way. Mr. Kakar, like his  
10 fellow Board members, is also involved in deciding what positions OA should take on questions  
11 of public concern and whether to support or act in concert with potentially allied organizations.  
12 Further, Mr. Kakar, along with his Board colleagues, votes on whether to support or oppose  
13 ballot measures which OA staff brings to the attention of the OA Board. Although Mr. Kakar  
14 does not determine the amount of money OA spends to support or oppose ballot measures, his  
15 vote is a necessary predicate to such contributions and expenditures and he is aware that OA staff  
16 will commit financial resources based on his and fellow Board members' decisions.

17 2.18 In his capacity as chair of the OA Board's fundraising and development committee, Mr.  
18 Kakar is responsible for organizing and promoting events to raise funds for OA from non-grant  
19 sources.

20 2.19 Mr. Kakar, like other immigrant/non-citizen members and supporters of OA, donates  
21 money to OA to support its mission. Mr. Kakar also donates money to various non-profit  
22 organizations located in Washington.

1 2.20 Similarly, Plaintiff Virginia Flores has been a member of OA since June 2017, a member  
2 of the GRLC since January 2019, and a leadership fellow since mid-2018. Ms. Flores was born  
3 in an impoverished village in Oaxaca, Mexico. In or about 1992, she moved to the United States  
4 to escape poverty and find opportunities to work and make a better life, although she did not  
5 obtain a work visa at the time. Since then, Ms. Flores has lived almost continuously in the United  
6 States. She has worked in California, Oregon, and Washington as a strawberry picker,  
7 seamstress, cannery worker, house cleaner, and home caregiver. Ms. Flores has resided in  
8 Vancouver, Washington since 2013. She is currently working with an immigration attorney to  
9 seek legal residency status in the United States.

10 2.21 Ms. Flores has four children who are American citizens, one of whom is an active duty  
11 member of the armed services. She is also an active member of her church and serves as a liaison  
12 between teachers and a Spanish-speaking parent group at her child's school.

13 2.22 In her capacity as a member of the GRLC, Ms. Flores participates in endorsement  
14 interviews of candidates for state and local office. She also participates in the GRLC's  
15 subsequent deliberations on which candidates to endorse. The recommendations resulting from  
16 those deliberations are forwarded to the OAV Board and staff. Ms. Flores is aware that OAV,  
17 through the Justice Fund, will spend funds to support or oppose candidates for election based on  
18 the GRLC's recommendations and the OAV Board's decisions on those recommendations.

19 2.23 Local 4121 is another organization with which immigrant and non-citizen residents of  
20 Washington are deeply involved and which, in order to effectuate its mission, engages in  
21 political activities in this State.

22 2.24 Local 4121 is a labor union which represents academic student employees and post-  
23 doctoral researchers employed by the University of Washington. A significant percentage of  
24



1 Local 4121's membership are international students or scholars who are temporary resident  
2 aliens holding F-1, J-1, J-2 or other visas. Local 4121 also represents undocumented immigrants.

3 2.25 Local 4121 is governed by an Executive Board, which is composed of eleven officers  
4 elected by the union membership at large, as well as a Joint Council, which is composed of the  
5 Executive Board members together with the head stewards elected by each unit of the union.

6 2.26 Local 4121 participates in campaign finance activities through its Western States  
7 Community Action Program and Political Action Committees (Western States), made up of  
8 delegates from multiple UAW-affiliated unions in Washington, Alaska, Arizona, California,  
9 Hawaii, Idaho, Oregon, Nevada, and Utah. Western States delegates together determine which  
10 Washington candidates to support, how to support those candidates, and how much money to  
11 allocate to candidate campaigns and independent expenditures. Western States and its affiliated  
12 unions do not restrict non-citizens or non-permanent residents from serving as delegates.

13 2.27 Local 4121 gives direction to its Western States delegates via recommended candidate  
14 endorsements issued by the Joint Council. The Joint Council bases its endorsement  
15 recommendations on recommendations from the Political Working Group, which is open to  
16 participation by all Local 4121 members, as well as advisory votes by the entire membership.  
17 The Political Work Group submits and reviews candidate questionnaires and conducts candidate  
18 interviews. Local 4121 does not restrict non-citizens or non-permanent residents from serving on  
19 the Joint Council or the political working group or from participating in any part of the review  
20 and deliberation process. Nor does it restrict those non-citizens and non-permanent residents who  
21 serve in these bodies from participating in the interview and recommendation process. Indeed, a  
22 number of union members who are temporary resident aliens currently serve on the Joint Council  
23 and political working group and participate in this process.

1 2.28 By way of example, Plaintiff Nayon Park has served as a Head Steward for the Academic  
2 Student Employee Unit for Local 4121's Joint Council since 2019. As part of her duties as a  
3 member of the Joint Council, Ms. Park votes on the political working group's candidate  
4 recommendations, which Local 4121's Western States delegates relies upon in helping to craft  
5 the Western States' campaign finance decisions.

6 2.29 Ms. Park, who is a citizen of South Korea, holds an F-1 student visa and has resided in  
7 Seattle since 2017. From 2013 to 2017, Ms. Park attended Carleton College on an F-1 student  
8 visa, where she obtained her undergraduate degree. Beginning in 2017, she has been enrolled in a  
9 5-year Chemistry Ph.D. program at the University of Washington and currently intends to remain  
10 in Seattle through at least 2022. In addition to her roles with Local 4121, Ms. Park has been  
11 heavily involved in campaigning for affordable housing in Seattle and has helped canvass and  
12 organize campaign events on behalf of a candidate running for election to Seattle's city council.

13 **B. The Washington Legislature Enacts Substitute Senate Bill 6152.**

14 2.30 In March 2020, the Washington Legislature enacted Substitute Senate Bill 6152 (SSB  
15 6152 or Act). *See* Laws of 2020, Ch. 152, §§ 1-11. Governor Jay Inslee signed the bill into law  
16 on March 25, 2020. The law became effective on June 11, 2020.

17 2.31 Entitled "[a]n Act [r]elating to certification concerning the level of foreign national  
18 ownership and control of entities that participate in Washington state elections," SSB 6152  
19 amends various sections of RCW Chapter 42.17.A, which codifies Washington's campaign  
20 finance law, the Fair Campaign Practices Act (FCPA).

21 2.32 Section 1 of the Act, which sets forth the Legislature's findings, acknowledges that the  
22 right to make contributions to candidate campaigns and ballot initiatives is a facet of "core" "free  
23 speech and free association" rights. SSB 6152, § 1. However, it asserts that these rights are  
24

1 “reserved solely for citizens of the United States and permanent legal residents” and that “[t]he  
2 First Amendment protection for political speech does not apply to foreign nationals.” *Id.*

3 2.33 Section 1 states further that the “individual states” must protect against “foreign influence  
4 in our state and local elections by requiring certification that contributions, expenditures,  
5 political advertising, and electioneering communications are not financed in any part by foreign  
6 nationals and that foreign nationals are not involved in making decisions regarding such election  
7 activity in any way.” SSB 6152, § 1

8 2.34 Section 2 of SSB 6152 defines “foreign national” to include “(a) [a]n individual who is  
9 not a citizen of the United States and is not lawfully admitted for permanent residence; (b) [a]  
10 government, or subdivision, of a foreign country; (c) [a] foreign political party; and (d) [a]ny  
11 entity, such as a partnership, association, corporation, organization, or other combination of  
12 persons, that is organized under the laws of or has its principal place of business in a foreign  
13 country.” SSB 6152, § 2(24).

14 2.35 Section 9 of SSB 6152 creates a new section in the FCPA which prohibits above-defined  
15 foreign nationals from “[m]ak[ing] a contribution to any candidate or political committee,  
16 mak[ing] an expenditure in support of or in opposition to any candidate or ballot measure, or  
17 sponsor[ing] political advertising or an electioneering communication.” SSB 6152, § 9(1).

18 2.36 In addition to prohibiting foreign nationals from spending money for political purposes,  
19 Section 9 prohibits citizens and lawful permanent residents from engaging in those same  
20 activities if foreign nationals have either: (a) “financed [] any part” of the activity or (b) been  
21 “involved in making decisions” regarding the activity “in any way.” SSB 6152, § 9(2). In other  
22 words, for a given contribution, expenditure, or sponsored communication to be valid, a foreign  
23 national cannot have been involved in the decision to undertake the transaction *in any way*.

1 2.37 Further, SSB 6152 amends existing sections of the FCPA's reporting and disclosure  
2 obligations by requiring reporting entities to indicate that they have complied with Section 9's  
3 substantive prohibitions with respect to reportable transactions.

4 2.38 Those sections concerning the disclosure of contributions received require the reporting  
5 political committee to state that it has obtained the contributor's certification that the latter has  
6 not relied on impermissible foreign national financing or participation in deciding to make the  
7 contribution. *See* SSB 6152, §§ 3(5), 4(1)(i), 7(7)(e). Those sections concerning the disclosure of  
8 expenditures made or advertisements or electioneering communications sponsored require the  
9 reporting party to directly certify that foreign nationals did not finance any part of the reported  
10 activities and were not involved in any way in making decisions about the activities. SSB 6152,  
11 §§ 5(d), 6(g), 8(1)(b)(iii).

12 2.39 The FCPA's existing penalties for statutory violations are equally applicable to the  
13 prohibitions and requirements enacted though SSB 6152 as they are to any other provision of  
14 RCW 42.17A. Civil penalties available under the FCPA include fines of \$10,000 per violation,  
15 or in some cases, three times the amount of the proscribed transaction, RCW 42.17A.750(1)(c);  
16 RCW 42.17A.755(3)(b); \$10 for every day a person fails to disclose information on required  
17 statements or reports, RCW 42.17A.750(1)(e); or an amount equal to the unreported contribution  
18 or expenditure, RCW 42.17A.750(1)(g). In addition, a court is authorized to refer violations for  
19 criminal prosecution if it finds they were committed with actual malice. RCW 42.17A.750(2).

20 **C. SSB 6152 Prohibits Plaintiffs from Engaging in Otherwise Lawful Political**  
21 **Activities.**

22 2.40 SSB 6152 goes far beyond existing federal law in curtailing the ability of "foreign  
23 nationals", and those with whom they choose to associate, to engage in otherwise lawful political  
24

1 activities. In order to comply with SSB 6152, Plaintiffs would have to drastically alter or cease  
2 their political activities.

3 2.41 With respect to OA, OAV, Local 4121, and similarly situated organizations, compliance  
4 with SSB 6152 would mean, at the very least, excluding individuals who fall within the statute's  
5 definition of "foreign nationals" from participating in decisions on how to support or oppose  
6 candidates and ballot initiatives and how much money to allocate for these purposes. On its face,  
7 the law also prevents organizations from allowing foreign national officers, staff, or members  
8 from even participating, advising, recommending, or consulting in the threshold decision of  
9 which candidates and ballot initiatives the organization should support or oppose.

10 2.42 OA's and OAV's Boards of Directors, staff, and the GRLC regularly deliberate and make  
11 decisions about supporting or opposing Washington electoral campaigns and ballot initiatives.  
12 Rank and file members also provide informal advice and input on these issues. OA and OAV  
13 rely upon these decisions and recommendation to decide whether, how, and to what extent to  
14 expend funds for political purposes. Foreign nationals, as defined in SSB 6152, currently serve  
15 or are allowed to serve on these organizations' Boards of Directors, staff, and GRLC. They also  
16 make up a significant proportion of OA's and OAV's membership.

17 2.43 Because these foreign nationals are "involved" in some way in campaign finance  
18 decisions, OA and OAV likely can no longer allow foreign nationals to serve on their Boards of  
19 Directors, staff, or the GRLC, or else they must require foreign nationals who serve on these  
20 bodies to recuse themselves from all deliberations which do or may implicate questions of  
21 political advocacy. Meanwhile, OA and OAV staff and officers who are citizens or lawful  
22 permanent residents must consciously avoid discussing questions of political advocacy with their  
23 foreign national colleagues as well as the foreign national members they are supposed to serve.

1 2.44 Likewise, Local 4121's Joint Council, political working group, and their Western States  
2 delegates and officers regularly deliberate and make decisions about supporting or opposing  
3 Washington electoral campaigns and ballot initiatives, which the Western States rely upon to  
4 decide whether, how, and to what extent to expend funds for political purposes. Foreign  
5 nationals, as defined in SSB 6152, currently serve or are allowed to serve on Local 4121's Joint  
6 Council and political working group and as delegates and officers to the Western States.

7 2.45 Because these foreign nationals are "involved" in some way in campaign finance  
8 decisions, Local 4121 likely can no longer allow foreign nationals to serve on its Joint Council,  
9 political working group, or as delegates or officers to the Western States, or else it must require  
10 foreign nationals who serve on these bodies to recuse themselves from all deliberations which do  
11 or may implicate questions of political advocacy. Meanwhile, Local 4121 officers who are  
12 citizens or lawful permanent residents must consciously avoid discussing questions of political  
13 advocacy with their foreign national colleagues.

14 2.46 With respect to Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated individuals,  
15 compliance with SSB 6152 would likely require them to resign from their current positions with  
16 their respective organizations or else recuse themselves from deliberations concerning political  
17 activities and other topics which indirectly touch on political activities. In Mr. Kakar's case, he  
18 would be left with few responsibilities and would likely resign his posts on the OA Board of  
19 Directors and fundraising and development committee in order to avoid running afoul of the  
20 statute.

21 2.47 In addition, under SSB 6152, Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated  
22 individuals can no longer contribute money in support of or opposition to ballot initiatives, an  
23 activity not prohibited under federal law. SSB 6152 also duplicates federal law's prohibition on  
24

1 these individuals contributing to or expending money on behalf of state or local political  
2 committees, candidate campaigns, or electioneering communications.

3 2.48 Finally, Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated individuals will be  
4 deterred from donating to any non-profit organization. That is because, even if a non-profit  
5 organization does not ostensibly constitute a political committee, under the FCPA, political  
6 committee status is a fact-dependent inquiry that may periodically change. In order to avoid  
7 inadvertently making contributions to organizations that are or are subsequently found to be  
8 political committees, as defined by RCW 42.17A.005(41), prudent foreign nationals will cease  
9 all donation activity.

#### 10 **IV. CAUSES OF ACTION**

##### 11 **COUNT I – SECTION 9(2)(B) OF SSB 6152 VIOLATES ARTICLE I, 12 SECTIONS 4 & 5 OF THE WASHINGTON CONSTITUTION BY 13 ABRIDGING ALL PLAINTIFFS’ FREEDOM OF SPEECH, 14 ASSOCIATION, AND ASSEMBLY.**

15 3.1 Plaintiffs re-allege and incorporate by reference Paragraphs 1.1 through 2.48 above.

16 3.2 The Washington Constitution enumerates certain rights that apply to “every person” who  
17 resides in the state, regardless of the individual’s alienage. Accordingly, those rights are enjoyed  
18 by institutional persons such as OA, OAV, and Local 4121, as well as natural persons who are  
19 neither citizens nor lawful permanent residents of the United States, such as Mr. Kakar, Ms.  
20 Flores, and Ms. Park.

21 3.3 Article I, Section 5 of the Washington Constitution protects the right of “every person” to  
22 “freely speak, write and publish on all subjects, being responsible for the abuse of that right.”  
23 Wash. Const. art. I, § 5. The protections accorded free speech are especially pronounced with  
24 respect to political speech and receive their fullest and most urgent application in the context of  
electoral and ballot initiative campaigns. Protected political speech includes the contribution and

1 expenditure of money in support of or opposition to candidate campaigns and ballot initiatives,  
2 as well as sponsorship of political advertisements and electioneering communications. It also  
3 includes the open discussion of whether, how, and to what extent to financially support or  
4 oppose candidate campaigns and ballot initiatives. Organizations such as OA, OAV, and Local  
5 4121 engage in protected speech when they make contributions to political committees and  
6 candidate campaigns; when they make expenditures in support of or opposition to candidates and  
7 ballot initiatives; and when they financially sponsor political advertisements or electioneering  
8 communications. The officers, staff, and members of these organizations—including foreign  
9 nationals such as Mr. Kakar, Ms. Flores, and Ms. Park—engage in protected speech when they  
10 discuss with each other whether, how, and to what extent their organizations should financially  
11 support or oppose candidates or ballot initiatives.

12 3.4 As an adjunct of the right to speak freely, Article I, Section 5 also protects the right of  
13 every person to freely associate with other persons of their choosing. This includes the right to  
14 associate with like-minded individuals through political organizations to advance shared  
15 ideologies. Foreign national residents of Washington such as Mr. Kakar, Ms. Flores, and Ms.  
16 Park exercised this right when they joined their respective organizations, assumed leadership  
17 responsibilities, and participated in discussions with their colleagues and voted on supporting or  
18 opposing electoral candidates and ballot initiatives. By the same token, the other officers, staff,  
19 and members of OA, OAV, and Local 4121 exercise their associational rights by consulting Mr.  
20 Kakar, Ms. Flores, Ms. Park, and other foreign national resident officers, staff, and members in  
21 formulating those organizations' political preferences.

22 3.5 Article I, Section 4 of the Washington Constitution protects “the right of petition and of  
23 the people peaceably to assemble for the common good.” Wash. Const., art. I, § 4. This includes  
24



1 the right of members of political organizations to meet and discuss matters of public concern, to  
2 make recommendations for the advancement of the common good, and petition other members  
3 of the public to join them. Foreign national residents of Washington such as Mr. Kakar, Ms.  
4 Flores, and Ms. Park exercise these rights when they participate in discussions with their  
5 colleagues and voted on supporting or opposing electoral candidates and ballot initiatives. By the  
6 same token, the other officers, staff, and members of OA, OAV, and Local 4121 exercise their  
7 assembly rights by consulting Mr. Kakar, Ms. Flores, Ms. Park, and other foreign national  
8 resident officers, staff, and members of the organizations in formulating those organizations'  
9 political preferences.

10 3.6 The State may restrict the rights of speech, association, and assembly only insofar as it is  
11 reasonably necessary to accomplish the essential needs of the State and public order.

12 3.7 By conditioning the contribution of funds to political committees or candidate  
13 campaigns; the expenditure of funds in support of or opposition to a candidate or ballot initiative;  
14 and the sponsorship of a political advertisement or electioneering communication on the  
15 exclusion of foreign nationals from any involvement in the campaign financing decision-making  
16 process, Section 9(2)(b) of SSB 6152 abridges the right of OA, OAV, Local 4121, and similarly  
17 situated organizations to engage in protected political speech. Because the practical effect of  
18 complying with this condition would be to prevent foreign nationals from expressing their views  
19 on political issues within the organizations to which they belong, Section 9(2)(b) also abridges  
20 the right of Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated foreign national residents  
21 from engaging in protected political speech. Preventing Plaintiffs from engaging in protected  
22 political speech is not necessary to accomplish any essential needs of the State or public order.  
23 Therefore, Section 9(2)(b) violates Article I, Section 5 of the Washington Constitution.

1 3.8 By conditioning the above political activities on the exclusion of foreign nationals from  
2 any involvement in the campaign financing decision-making process, Section 9(2)(b) of SSB  
3 6152 abridges the right of the officers, staff, and members of OA, OAV, Local 4121, and  
4 similarly situated organizations to freely associate with their colleagues and peers who are  
5 foreign national residents of Washington. By the same token, Section 9(2)(b)'s condition  
6 abridges the right of Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated foreign national  
7 residents from freely associating with their citizen and permanent resident colleagues and peers.  
8 Preventing Plaintiffs from freely associating with one another is not necessary to accomplish any  
9 essential needs of the State or public order. Therefore, Section 9(2)(b) violates Article I, Section  
10 5 of the Washington Constitution.

11 3.9 By conditioning the above political activities on the exclusion of foreign nationals from  
12 any involvement in the campaign financing decision-making process, Section 9(2)(b) of SSB  
13 6152 abridges the right of the officers, staff, and members of OA, OAV, Local 4121, and  
14 similarly situated organizations to assemble for the common good. By the same token, Section  
15 9(2)(b)'s condition abridges the right of Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated  
16 foreign national residents from assembling for the common good. Preventing Plaintiffs from  
17 assembling for the common good is not necessary to accomplish any essential needs of the State  
18 or public order. Therefore, Section 9(2)(b) violates Article I, Section 4 of the Washington  
19 Constitution.

20 **COUNT II – SECTION 9(2)(B) OF SSB 6152 VIOLATES ARTICLE I,**  
21 **SECTION 3 OF THE WASHINGTON CONSTITUTION BECAUSE IT IS**  
22 **IMPERMISSIBLY VAGUE.**

23 3.10 Plaintiffs re-allege and reincorporate by reference Paragraphs 1.1 through 3.9 above.  
24

1 3.11 Article I, Section 3 of the Washington Constitution states that “[n]o person shall be  
2 deprived of life, liberty, or property, without due process of law.” Wash. Const. art. I, § 3. This  
3 due process guarantee protects against the imposition of unconstitutionally vague statutes.

4 3.12 A statute is unconstitutionally vague if (1) it does not sufficiently define the proscribed  
5 conduct so that an ordinary person can understand the prohibition or (2) it does not provide  
6 sufficiently ascertainable standards to protect against arbitrary enforcement.

7 3.13 Section 9(2)(b) of SSB 6152 is insufficiently definite because it is difficult, if not  
8 impossible, for an ordinary person to know what it means to “involve” someone in “making  
9 decisions” about political contributions and expenditures, especially when the prohibition  
10 purports to be all-encompassing by prohibiting foreign nationals from being involved “in any  
11 way.” There are many ways to engage in a decision-making process and there is no obvious way  
12 to know how remote or indirect of a participation counts as “involvement” within the meaning of  
13 Section 9(2)(b).

14 3.14 In addition, Section 9(2)(b) of SSB 6152 does not provide sufficiently ascertainable  
15 standards to protect against arbitrary enforcement because the statute leaves it entirely to  
16 enforcing officers to decide when a foreign national has been “involved in any way” in a  
17 person’s decision-making on contributions, expenditures, political advertisements, or  
18 electioneering communications. Such extraordinary discretion is inconsistent with the due  
19 process guarantee.

20 3.15 Accordingly, Section 9(2)(b) of SSB 6152 violates Article I, Section 3 of the Washington  
21 Constitution.

22 **COUNT III – SECTION 9 OF SSB 6152 VIOLATES ARTICLE I,**  
23 **SECTION 3 OF THE WASHINGTON CONSTITUTION BECAUSE IT IS**  
24 **FACIALLY OVERBROAD.**

3.16 Plaintiffs re-allege and reincorporate by reference Paragraphs 1.1 through 3.15 above.

1 3.17 Article I, Section 3's guarantee of due process includes the substantive due process of  
2 freedom from government interference with the exercise of fundamental rights.

3 3.18 A law which on its face is so overbroad that it prohibits a substantial amount of  
4 constitutionally protected conduct as well as unprotected conduct violates substantial due  
5 process.

6 3.19 Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated foreign national residents engage  
7 in constitutionally protected speech when they make contributions to political committees or  
8 candidate campaigns, expend money in support of or opposition to candidates or ballot  
9 initiatives, or sponsor political advertisements or electioneering communications. They also  
10 engage in constitutionally protected speech, association, and assembly when they help finance  
11 other parties' contributions and expenditures and when they participate in decision-making on  
12 whether, how, and to what extent to financially support or oppose candidates and ballot  
13 initiatives. Likewise, OAV, OA, Local 4121, and similarly situated organizations engage in  
14 constitutionally protected speech and association when they solicit donations from supporters.  
15 Such organizations also engage in constitutionally protected speech and association when they  
16 consult with members and supporters, who happen to be foreign nationals, regarding whether  
17 and how to engage in the political process.

18 3.20 Section 9 of SSB 6152 prohibits Plaintiffs from engaging in these constitutionally  
19 protected activities.

20 3.21 To the extent Section 9 regulates any unprotected conduct, it is overinclusive by virtue of  
21 sweeping in these constitutionally protected activities.

22 3.22 Section 9 is not susceptible to a limiting construction that excises the prohibitions on  
23 constitutionally protected activities because the prohibitions are absolute and, in the case of  
24

1 Section 9(2)(b), expressly proscribes the maximal amount of foreign national conduct by  
2 prohibiting their involvement in decision-making “in any way.”

3 3.23 Accordingly, Section 9 violates Article I, Section 3 of the Washington Constitution.

4 **COUNT IV – SECTION 9(1) OF SSB 6152 VIOLATES ARTICLE I,**  
5 **SECTIONS 4 & 5 OF THE WASHINGTON CONSTITUTION BY**  
6 **ABRIDGING MR. KAKAR’S, MS. FLORES’, AND MS. PARK’S**  
7 **FREEDOM OF SPEECH AND PETITION.**

8 3.24 Plaintiffs re-allege and reincorporate by reference Paragraphs 1.1 through 3.23 above.

9 3.25 As explained, Article I, Section 5 of the Washington Constitution protects the political  
10 speech of every person who resides in Washington, regardless of alienage. Political speech  
11 includes contributing money to political committees and candidate campaigns, expending money  
12 in support of or opposition to candidate campaigns and ballot initiatives, or sponsoring political  
13 advertisements and electioneering communications.

14 3.26 Article I, Section 4 of the Washington Constitution protects the right to petition for the  
15 common good. Financially supporting political advertisements and electioneering  
16 communications is a protected instance of petitioning for the common good.

17 3.27 Section 9(1) of SSB 6152 prohibits foreign nationals residents such as Mr. Kakar, Ms.  
18 Flores, and Ms. Park from engaging in these forms of political speech and petitioning.

19 3.28 In so doing, Section 9(1) restricts Mr. Kakar, Ms. Flores, Ms. Park, and similarly situated  
20 foreign national residents from freely expressing their political opinions. Preventing these  
21 individuals from engaging in political speech and petitioning is not necessary to accomplish any  
22 essential needs of the State or public order.

23 3.29 Therefore, Section 9(1) violates Article I, Section 5 of the Washington Constitution.

24 **COUNT V – SECTION 9 OF SSB 6152 VIOLATES ARTICLE I,**  
**SECTION 12 OF THE WASHINGTON CONSTITUTION BY**  
**DISCRIMINATING AGAINST WASHINGTON RESIDENTS BASED**  
**ON ALIENAGE.**

1 3.30 Plaintiffs re-allege and reincorporate by reference Paragraphs 1.1 through 3.29 above.

2 3.31 Article I, Section 12 of the Washington Constitution states that “[n]o law shall be passed  
3 granting to any citizen, class of citizens, or corporation other than municipal, privileges or  
4 immunities which upon the same terms shall not equally belong to all citizens, or corporations.”  
5 Wash. Const. art. I, § 12.

6 3.32 Despite its reference to “citizens,” Section 12 has been interpreted to apply equally to  
7 resident aliens living in Washington.

8 3.33 A classification based on an individual’s status as an alien is inherently suspect and  
9 subject to strict judicial scrutiny.

10 3.34 Section 9 of SSB 6152 discriminates among contributions and expenditures based on the  
11 alienage of the spender, or based on the spender’s association with an alien. Section 9 is thus is  
12 subject to strict scrutiny.

13 3.35 Washington has no compelling interest in restricting contributions and expenditures  
14 based on a person’s alienage.

15 3.36 Even if Washington had a compelling interest in restricting contributions and  
16 expenditures based on this protected classification, it is not narrowly tailored to effectuate the  
17 putative interest at stake.

18 3.37 Therefore, Section 9 does not meet the strict scrutiny test and violates Article 1, Section  
19 12 of the Washington Constitution.

20 **COUNT VI – SSB 6152 MUST BE STRUCK DOWN IN ITS ENTIRETY**  
21 **BECAUSE THE UNLAWFUL ELEMENTS OF THE LAW CANNOT**  
22 **BE SEVERED FROM THE LAWFUL ELEMENTS.**

22 3.38 Plaintiffs re-allege and reincorporate by reference Paragraphs 1.1 through 3.37 above.

23 3.39 An unconstitutional provision of a statute may not be severed if its connection to the  
24 remaining, constitutionally sound provision is so strong that it could not be believed that the

1 legislature would have passed one without the other, or where the part eliminated is so intimately  
2 connected with the balance of the act as to make it useless to accomplish the purposes of the  
3 legislature.

4 3.40 The presence of a severability clause in a statute is evidence that the legislature would  
5 have enacted the constitutional portions of a statute without the unconstitutional portions.

6 3.41 The Washington legislature would not have enacted SSB 6152 without Section 9 because  
7 the remaining sections merely create reporting and disclosure requirements to confirm  
8 compliance with Section 9's substantive prohibitions. It therefore would have been useless to  
9 enact the balance of the statute without Section 9.

10 3.42 SSB 6152 also lacks a severability clause, indicating that the drafters did not intend to let  
11 some sections of law survive without the rest.

12 3.43 Because Section 9 of SSB 6152 is unconstitutional and the remainder of the law is  
13 inextricably tied to it, the Act must be struck down in its entirety.

#### 14 **V. PRAYER FOR RELIEF**

15 THEREFORE, Plaintiffs request that this Court:

16 A. Declare SSB 6152 unconstitutional and unenforceable;

17 B. Issue a permanent injunction prohibiting the State, the AGO, the PDC, and any of  
18 their agents from enforcing the provisions of SSB 6152;

19 C. Award Plaintiffs their reasonable attorneys' fees and costs incurred in bringing this  
20 action; and

21 D. Grant such other relief as the Court deems just and proper.

22 //

23 //

1 RESPECTFULLY SUBMITTED this 7th day of September, 2020.

2 s/Dmitri Iglitzin

Dmitri Iglitzin, WSBA No. 17673

3 Darin M. Dalmat, WSBA No. 51384

Ben Berger, WSBA No. 52909

4 **BARNARD IGLITZIN & LAVITT LLP**

18 W Mercer St, Suite 400

5 Seattle, WA 98119

Phone: (206) 257-6003

6 Facsimile: (206) 257-6038

E-mail: [iglitzin@workerlaw.com](mailto:iglitzin@workerlaw.com)

7 E-mail: [dalmat@workerlaw.com](mailto:dalmat@workerlaw.com)

8 E-mail: [berger@workerlaw.com](mailto:berger@workerlaw.com)





# City of Seattle

Ethics and Elections Commission

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February 21, 2017

**BY E-MAIL ONLY**

Dan DiLeva, Treasurer  
Vote Sawant  
P.O. Box 85862  
Seattle, WA 98145-1862

Dear Mr. DiLeva:

As you may know, the Public Disclosure Commission recently referred to us a complaint filed against the Vote Sawant Committee ("Committee") that included allegations that the Committee failed to properly report obligations in 2015. By a letter dated February 7, 2017, I dismissed that complaint, noting specifically that I had penalized the Committee \$1,500 last January for failing to properly report obligations in 2015.

Subsequent to dismissing the complaint, it came to my attention that the \$1,500 penalty was imposed solely for violations that occurred in the month prior to the General Election contest. The complaint, however, further alleged violations prior to the Primary Election, namely the failure to timely report as an obligation a mailer that went out at a cost of approximately \$18,000. In a letter to the Attorney General's office, the Committee's attorneys acknowledged that this was not timely reported.

Because the principle goal of a penalty is to educate the filer on the necessity of complying with the law, I do not believe another substantial penalty is warranted for this violation. The January 2016 penalty served to put the Committee on notice that, going forward, it must report obligations in a timely fashion.

There is, however, an outstanding violation that calls for a response from this office. I am imposing a \$150 penalty for this pre-primary violation because it was a significant obligation that went unreported. I believe that this relatively small penalty is appropriate when viewed together with the \$2,000 in penalties that this office already levied against the Committee's 2015 effort.

## RIGHT TO APPEAL

You may appeal this decision by submitting to this office, by 4:00 p.m., March 7, 2017, a written request for appeal, pursuant to the Commission's Administrative Rule 4.<sup>1</sup>

## ACTION TO TAKE

1. Amend the 7-day pre-Primary C-4 to include obligations that were incurred during the corresponding reporting period but not reported as obligations.
2. No later than March 7, 2017, deliver payment payable to the City of Seattle, to the Commission at 700 Fifth Avenue, Suite 4010, P.O. Box 94729, Seattle, WA 98124-4729, or your request for appeal.

## CONCLUSION

A successful campaign finance reporting regime requires that all campaigns abide by the same rules, and that campaigns act in good faith to comply with the law.

If you have any questions, please call me at 684-8577.

Very truly yours,



Wayne Barnett  
Executive Director

cc: Seattle Ethics and Elections Commission  
Evelyn Fielding Lopez, Executive Director, Public Disclosure Commission  
Tony Perkins, Attorney General's Office  
Glen Morgan  
Dmitri Iglitzin and Laura Ewan, Attorneys for Kshama Sawant

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<sup>1</sup> Rule 4 APPEALS

A. Upon the written request of a party aggrieved by the Executive Director's decision to ... impose late-filing penalties under SMC 2.04.330, the action may be reviewed by the Commission.

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C. An appeal of late-filing penalties shall be served at the Commission's office no later than 14 days after the date of mailing the decision of which review is sought.

D. A request for review shall state the grounds therefor, and shall be no longer than twelve 8-1/2" x 11" double-spaced pages in length with margins of at least 1" on every side...