

I'm submitting a follow-up to address some of Mr. Linebarger's relevant assertions in his response to Case #99327, as well as Mrs. Orebaugh's response, regarding Washington Citizens for Liberty and what appears to be a pattern of political activities surrounding the Central Valley School District school board races. I am submitting this response on behalf of only myself, a citizen who lives in the school district, and not on behalf of Mr. Taylor, the other complainant in the case of whom I had no knowledge prior to our separate complaints being combined and seeing his name on the PDC website, despite Mr. Linebarger's speculation. I am also a business owner, and therefore work for myself, and am not engaged in any activity on behalf of a client. As a resident of Spokane Valley, I have a relevant interest in the future of CVSD and am eligible to have concerns around campaign activities on my own behalf and what appear to be several open violations of state campaign requirements, in my opinion based on the evidence I've seen.

The assertion in this claim is that Washington Citizens for Liberty has engaged in support of candidates and has reported neither themselves as a committee nor their activities to the PDC, has not included proper sponsor information on materials in support of candidates, and "was established for and had the expectation of supporting candidates." Perhaps Mr. Linebarger thinks by attaching the word "financially" to the end of that sentence in his response that they can skirt relevant requirements – I can only speculate. However true or untrue that may be, as the PDC is obviously aware, direct financial contributions are not the only reportable candidate contributions.

I'd like to add a few additional points and pieces of evidence to this case, most of which I was not aware of at the time of my initial complaint.

1. Attached as Exhibit F – new to this complaint – is an email sent by Pam Orebaugh on Saturday, Sep. 4 from her campaign email address with minutes from the Thursday, Sep. 2 Washington Citizens for Liberty (CFL) meeting. You can see the file attached to Mrs. Orebaugh's email is titled, "CFL Meeting minutes 9.2.21.docx." I have also attached this document to my response, unedited. You can right click the document, select Properties, then select the Details tab to see Pam Orebaugh's full name on the *Authors* and *Last saved by* lines to confirm this document was created by her and last saved by her on Sep. 4 at 12:04 p.m. Agenda Item (1) in the meeting minutes is "*Discussion of the status of the non-profit Washington Citizens for Liberty.*" Item (c) under that is "*Priorities of the non-profit,*" and listed first and foremost as priority (i) is "*Recall the school board.*" Under priority (i) are detailed descriptions of the planned Citizens for Liberty activities, including, "*WE WILL NEED SIGNATURE GATHERERS*" (capitalization theirs). Incidentally, priority (iii) appears to be signature gathering for a state referendum unrelated to this complaint. Printing petitions and signature gathering for a campaign to recall a sitting elected official is campaign activity, and, in Mrs. Orebaugh's own words, Citizens for Liberty was formed with that as their principal priority.

Further down in these Citizens for Liberty meeting minutes, under agenda item (2), you'll find the following: "*Bret Howell gave his story and what he will do if elected. He is a write-in candidate for position 2 of the CVSD board. The person running, Theresa Landra, is a liberal and running unopposed. **We need a lot of information out to voters since he will not be on the ballot. We have to teach voters to write his name in correctly and fill in the dot***" (emphasis mine). If you'll recall, this document is meeting minutes from Citizens for Liberty's meeting on Sep. 2. It clearly contains not just advocacy for a political candidate but details for the group's

future advocacy (“*we have to teach voters to write his name in correctly...*”). To claim that Citizens for Liberty has not been engaged in the active support of any political candidates appears, in my opinion, to be patently false.

2. Next, I’d like to submit another new piece of evidence to this claim, Exhibit G. This is an email sent from Rob Linebarger from his nonprofit email address, rob@citizens4liberty.org, on Saturday, Sep. 11. In the email, Rob provides a summary of recent Citizens for Liberty activities, including an event with a “large crowd” in a local park, presumably on Thursday, Sep. 9. Mr. Linebarger writes that after Grant Wolf spoke to the attendees, whom I presume to be the same man as the CFL lawyer Mr. Linebarger refers to in his complaint response, Mr. Linebarger “*followed up with a CVSD School Board Recall Operation organization and process briefing.*” He then proceeds to detail campaign operations, including naming precinct leaders and how many volunteers they need, presumably for signature collection – though as we learn later in Exhibit G, it appears these volunteers are also used to canvass for candidates Orebaugh and Howell. So again, according to this email sent by Mr. Linebarger, the nonprofit CFL appears to me to be actively engaged in a recall campaign and, at the very least, in-kind contributions of their time to support the election of Howell, as the candidate also spoke at this event with Mr.’s Linebarger and Wolf, according to Mr. Linebarger’s email.

In the same email after detailing a summary of the event in the park, Mr. Linebarger solicits contributions to Washington Citizens for Liberty and states their fundraising goal of \$20,000 by the end of September. He says, “*Presently we have raised \$9,000 to support legal defense and the Recall effort. The budget breakdown is 90% to legal defense, 10% to the Recall.*” At the very least, and recalling Exhibit F, this appears to me to unquestionably be the established purpose and expectation for the nonprofit.

But the most important part of this email and, in my opinion, the clearest indication of violations on the part of Citizens for Liberty comes at the end of Mr. Linebarger’s email to nonprofit supporters: “*If you would like to volunteer to canvas the 67 precincts in CVSD, engage our great citizens, **campaign for Bret and Pam and collect signatures for the recall** please reply to this email or contact Brittny [last name redacted] on Slack. I’m confident we will get the Court’s approval to move forward and once we do, we need to be ready to march*” (emphasis mine). In his own words in an email sent from his Citizens for Liberty email address, Mr. Linebarger appears to be calling for volunteers to join the nonprofit in campaigning for candidates Orebaugh (who is also a CFL board member) and Howell. The nonprofit is engaged in canvassing for two candidates and has not reported that as in-kind support nor filed as a committee with the PDC.

3. One part of the complaint that was not addressed by either Mrs. Orebaugh or Mr. Linebarger entails the fundraising appeal Mrs. Orebaugh sent her supporters on Sep. 10 asking for donations to Citizens for Liberty as an explicit way of supporting her campaign, attached in the initial complaint packet as Exhibit C. In the second paragraph of the email body on page two of Exhibit C:

*"Rob presented a clear flow chart last night of **volunteers needed to gather signatures and tell voters about Bret and me**. We need all levels of volunteers. I get it that we are all busy. Trust me....my schedule is insane. Rob is even busier. Everybody stepping up is busy. This is just for a season. But it is an important season. It is just for a time that we need help and money. What can you give us for time or money? What can you give up on a Saturday (or another day/evening) to help? What can you give up in money to help? A couple hours of going door to door is huge. **A 5- or 10-dollar donation helps. One sign and metal stand is about 5.00. Flyers range depending on how many we purchase (from 10 cents to 2.00). Lawyers are about 200 an hour.** Every little amount will help us significantly. We have been fortunate that we have gotten this far without asking for donations. However, we need them to continue much further. **I have Venmo and PayPal on my website (PayPal take 3%, Venmo is free to me). Bret has ability on his website now to collect donations. The non-profit site can take donations.**"*

In her own words (emphases mine), Mrs. Orebaugh spells out that according to Mr. Linebarger's presentation the night before, presumably at the Citizens for Liberty park meeting on Thursday, Sep. 9, CFL volunteers are needed to both gather signatures for the recall campaign and to canvass for herself and candidate Howell. She proceeds to detail the average costs of yard signs and campaign literature, then provides three links to donate to all these efforts: her campaign website, Howell's campaign website, and the nonprofit website. In her response to the complaint, Orebaugh said, "My campaign HAS NOT received a single penny from WA Citizens for Liberty." But has the nonprofit paid for yard signs or campaign literature for either herself or candidate Howell? At the very least, and in my opinion as appears to be suggested in emails from both Orebaugh and Howell, the nonprofit is canvassing on behalf of school board candidates without reporting any such activity.

4. To provide one more piece of evidence for this canvassing, I'd like to call your attention to one more email, sent from a Orebaugh and Howell supporter named Jim, attached as Exhibit H. I've chosen to redact Jim's last name and email in the attached, as Jim is not named in this complaint and appears to just be a volunteer, and it would be excessive and unwarranted to include his personal details in a public complaint.

But Jim is mentioned in the above email from Mrs. Orebaugh (Exhibit C). She ends the email: *"If you have experience fundraising and want to lead this aspect of this organization, please let me know. We are delegating leaders for certain areas. Rob and I cannot do it all. We have Britny, with help from Jim, overseeing the door-to-door campaign."*

As part of those apparent volunteer efforts, Jim's email sent out to the group on Friday, Sep. 17, says, *"We are aware that we have precinct leaders and volunteers established for the recall. However, since we are delayed in being able to gather signatures, it is imperative that we get the word out/flyers out for Pam and Bret as soon as possible. So, we are heading up this earlier precinct walking that is strictly for getting the word out about Pam and Bret and showing voters how to write in Bret on the ballot."* He goes on to add, *"This is not in lieu of the mobilization to gather signatures that Brittny is heading up. That will occur at a later date. You are needed for both if you are able."*

So, once again, it appears that volunteers are to be engaged for both the recall campaign and two school board campaigns, and the same efforts are being coordinated by the same people.

In the event respondents to this claim assert that nonprofit volunteers were only going to be engaged in future signature gathering for the recall effort – which is still a *campaign* – that seems to not be the case, as articulated by Mrs. Orebaugh and Mr. Linebarger and as it appears to be understood by their supporters, in my opinion based on the evidence I've seen and provided throughout this complaint. Further, if the bar for the PDC is whether "Citizens for Liberty was established for and had the expectation of supporting candidates," then it appears there are clear indications in emails sent from both Mrs. Orebaugh and Mr. Linebarger that CFL is certainly engaged in candidate support.

What this seems like to me, in my opinion based on the evidence that I've seen, is a group of individuals and a nonprofit that are engaging back-and-forth between canvassing for a recall campaign, canvassing for two school board campaigns, fundraising to support efforts for those campaigns, potential printing of campaign materials, and fundraising for a legal defense fund without any delineation between activities and any reporting of the campaign-related efforts that appear to be clearly demonstrated between all these pieces of evidence.

I appreciate the PDC for continuing to pursue this matter.



Fwd: Thursday meeting minutes

1 message

----- Forwarded message -----

From: **Pam Orebaugh** <ElectPam4Kids@hotmail.com>

Date: Sat, Sep 4, 2021 at 12:05 PM

Subject: Thursday meeting minutes

[REDACTED]

Hi all,

Please see the attached document for minutes from the meeting on Thursday.
Please do not share to social media.

Thanks,
Pam



CFL. Meeting minutes 9.2.21.docx
16K



Washington Citizens for Liberty 9/11 Remembrance and Weekly Wrap-up

Rob Linebarger <rob@citizens4liberty.org>

Sat, Sep 11, 2021 at 6:02 AM

To:

[Redacted email body content]



Hi Everybody,

Today many of us solemnly reflect on where we were at 8:46am EDT 20 years ago. I was living in Patuxent River, MD; stationed at Air Test and Evaluation Squadron One (VX-1) pre-flying my SH-60B aircraft for a training flight when the first aircraft hit the towers. Pre-flight completed, I walked into Maintenance Control to sign the aircraft log book when the 2nd plane hit the towers. It was clear now this was no accident. Shortly thereafter, we received word "all flights were grounded." About an hour later, I was ordered to suit up and launch. A Aegis Guided Missile Destroyer was speeding up Chesapeake Bay from Norfolk, VA to patrol just north of Annapolis, MD and they needed an airborne FLIR and LINK asset. VX-1 crews would fly that mission for the next 96 hours.

Tragic day no doubt but that event united us as one people just like the current battle we fight against Local, State, Federal and Global Tyranny unites us now. I'm proud to lock arms with each one of you and like I posted on Slack yesterday, "How do we know when the fight is over? WHEN WE WIN!"

Summary of last week's events and key takeaways:

- Pam Orebaugh and I along with Grant Wolf and Megan Lillis, attorneys from the Crago Law Office attended a District 81 Teacher's meeting at Audubon Park. Grant answered questions for 30 minutes regarding forced vaccinations.
- Grant Wolf answered questions from a large crowd at our Pavilion Park meeting for nearly an hour, I followed up with a CVSD School Board Recall Operation organization and process briefing. I announced Brittny Ramirez will lead the operation and we have 3 volunteers; Natalie Gauvin, Robin Joncyk, and Erin Zasada volunteered to lead Districts 2, 4, and 5. We still need volunteers to lead Districts 1 and 4. Reply to this email or contact Brittny on Slack if you are interested.
- Introduced Bret Howell, write-in candidate for CVSD position 2. Bret told his inspirational story to the group.
- Presently we have raised \$9,000 to support legal defense and the Recall effort. The budget breakdown is 90% to legal defense, 10% to the Recall. Once we have raised \$1,000 for the recall, 100% of the donations will go for legal defense. I'm paying for all operating expenses to ensure all net donations are used for these important projects.
- If you are able, please consider a donation to assist us with this fight. To donate please visit citizens4liberty.org or send a check made payable to Washington Citizens for Liberty to:

Washington Citizens for Liberty
PO Box 264
Liberty Lake, WA 99019

Our goal is to raise \$20,000 by the end of September

- If you would like to volunteer to canvas the 67 precincts in CVSD, engage our great citizens, campaign for Bret and Pam and collect signatures for the recall please reply to this email or contact Brittney Ramirez on Slack. I'm confident we will get the Court's approval to move forward and once we do, we need to be ready to march.

Best Regards
Rob Linebarger
Washington Citizens for Liberty



CVSD November 2 Election - Precinct Walkers Needed

Jim [REDACTED]

Fri, Sep 17, 2021 at 4:53 PM

To: Pam Orebaugh <ElectPam4Kids@hotmail.com>, Bret Howell <bret@brethowell.com>

Cc: [REDACTED]

[REDACTED]

We need precinct walkers to help elect two new members to the CVSD school board on November 2 - Pam Orebaugh and Bret Howell.

We are aware that we have precinct leaders and volunteers established for the recall. However, since we are delayed in being able to gather signatures, it is imperative that we get the word out/flyers out for Pam and Bret as soon as possible. So, we are heading up this earlier precinct walking that is strictly for getting the word out about Pam and Bret and showing voters how to write in Bret on the ballot. Please reach out to me if you are able to participate in this earlier precinct walking. This is not in lieu of the mobilization to gather signatures that Brittney is heading up. That will occur at a later date. You are needed for both if you are able.



This precinct walking is a small-time commitment, easy to do, and you will get in your steps! Wear your walking or running shoes!

Here is how it works:

- (1) I will provide you a precinct map with the names/addresses of high propensity voters in that precinct;
- (2) The average precinct will have 200 to 500 addresses;
- (3) I will provide you the flyers to drop off at each address (front door/doorsteps/etc) - there is no need to engage with voters, but of course, you can do that, but that will add a lot of time to the process;
- (4) You can do this any day of the week, but preferably in the next 4 to 5 weeks. Ballots will be mailed beginning October 13;
- (5) You can complete a precinct in one day, or half one day, the other half another day. Just keep good notes!
- (6) The precinct does not need to be in your area. There are over 60 precincts, so any one of them will work;

If you prefer a precinct near you, let me know. Otherwise, I will choose one for you in Spokane Valley or the Liberty Lake area.

I will deliver the precinct packages to you or make other arrangements as needed.

Thank you.

Jim 

Meeting minutes from Thursday 9/2

We are meeting every Thursday at 6:30 at Pavillion Park

1. Discussion of the status of the non-profit Washington Citizens for Liberty.
 - a. Website is citizens4liberty.org
 - b. We need donations to fund our legal proceedings
 - i. You can donate on the website or give money to Rob or I. A mailing address coming soon.
 - c. Priorities of the non-profit
 - i. Recall the school board. The lawyers are helping to look for cases where the judge has granted the signature gathering to proceed. We are doing our own investigations also. The process is that we file to a judge that the school board has violated their oath or duties and thus we want to recall them. This should be a procedural hearing but if we get a leftist-sympathetic or board-sympathetic judge, it could be an issue. If we are given the green light to proceed, we then need to collect signatures. We need 25% of the total number of voters from the last election the board members were in. We need overage to ensure we have enough signatures. If we get enough, they are recalled.
 1. WE WILL NEED SIGNATURE GATHERERS. We will be looking at data so that we can best utilize our time and go to households where they are strong voters (vote frequently) for signature gathering. We can divide the CVSD area up into teams or couples, etc. to ensure we are covering the largest area without overlapping. This will take all of us to do this. Please sign up to help cover an area—even just your neighborhood.
 - ii. Defend any citizen or group against unlawful termination due to vaccine mandates. We are hoping to get a class action lawsuit for all that are fired due to not taking the vaccine. Tell anybody in this position to hold strong. Don't quit! Force them to fire you. Have them join this group. There is not a legal case until injury (firing) occurs.
 - iii. We will be gathering signatures to put a referendum on the ballot to limit the governor's emergency powers. This will be a state-wide push. It is more long term than the other items. The governor's emergency powers are the root cause of all other issues. In the interim, please email and call consistently to all legislators and the governor to stop the mandates, to call a special session and limit his powers. It would be narrowly focused to limit the governor's emergency power to 30 days and requires a 2/3 majority of both chambers of the legislature to increase beyond 30 days. Any increase would be very limited in timing. They would have to reconvene in person each time to increase it.
 - d. If you know of any political meetings in a district, please let us know. Rob went and spoke to District 9 GOP meeting and was able to gain support. It is time to stop listening to our legislatures wine and complain and not do anything. We need them to take action. We need people to replace them if they don't.
 - e. Rob has stickers and business cards for the non-profit made. I also have some. Reach out if you want some.

2. Bret Howell gave his story and what he will do if elected. He is a write-in candidate for position 2 of the CVSD board. The person running, Theresa Landra, is liberal and running unopposed. We need a lot of information out to voters since he will not be on the ballot. We have to teach voters to write his name in correctly and fill in the dot.
3. We are moving information from our fb page to the slack app. If you want to join, you need to download the app and text Stephen. His number is 509-655-3414. I will continue to send updates to this email group. Have people reach out to me if they want to be added to the email group.
4. CVSD School Board meetings are on zoom—despite offering to wear masks, they will not go in-person. Please join the zoom. You can email comments—even though they don't read them. Next board meeting is 9/13 at 6:30. The link will show up on the CVSD about 48 hours before the meeting. I will distribute it also.
5. FOR THIS GROUP---NEXT MEETING 9/9 at 6:30 at Pavillion Park. We are hoping the lawyers will be able to join us then. We will meet every Thursday for now.