Respondent Name

Armen Papyan

Complainant Name

Glen Morgan

Complaint Description

Glen Morgan

(Thu, 28 Apr 2022 at 7:25 PM)

To whom it may concern,

It has recently come to my attention that Armen Papyan has violated campaign disclosure laws per **RCW 42.17A**, during his failed 2021 campaign for the Tukwila City Council. The violations are as follows:

1. The illegal transfer and misuse of campaign funds sent illegally to multiple non-existent surplus committees (Violation of RCW 42.17A.430, WAC 390-16-234)

I noticed this a while ago, but I'm running a little late catching up on the backlog of violators. I apologize for the delay in filing this complaint.

It appears that failed Tukwila candidate Armen Papyan made three illegal transfers on December 20, 2021 totaling \$1,300 from his campaign to fake or nonexistent "Surplus Accounts" that do not appear to exist in reality. (See PDC C4 Report #110068138). This is an explicit violation of RCW 42.17A.430, and WAC 390-16-234.

I have attached the referenced C4 report filed by failed candidate Armen Papyan as evidence identifying these illegal transfers of campaign cash. Please note, two of the transfers appear to be to a Surplus Account for himself, which doesn't appear to exist according to PDC reports, and one of these transfers was for \$500 to a "Vladimir Mironyuk" "Surplus Account" which also doesn't appear to exist anywhere on the PDC site.

If the expectation is for politicians, even failed political candidates like this one, to comply, even in a tangential manner with Washington State's amazing campaign finance laws, then, there must be some consequences (as minor as they might appear) for regularly violating those same laws.

It might be useful to explore the bank account and exactly where these funds were transferred since these accounts don't appear to exist in reality. Were they willfully misused for personal expenditures? It is impossible to know until the PDC investigates and gets to the bottom of this one.

This campaign certainly invites additional investigation.

Feel free to let me know if you need any additional information about this.

Best Regards,

Glen Morgan

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

The public has a right to know what candidates, even failed ones, do with their campaign funds. If these funds were used for illegal purposes, the public has a right to know.

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

I've attached the relevant C4 for reference

List of potential witnesses

The candidate, his treasurer, the mystery person named in the C4, and everyone else who has their hand in this cookie jar.

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.



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 110068138

01-05-2022

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

(Friends of Armen Papy	ran)									
Mailing Address 5604 S 150th ST						City Tukwila, W	A			
Zip + 4 98188	Office Sought (Candidates CITY COUNCIL MED	•			te				us Committees: During ttee make an independent	
Report Period From (last C-	4) To (end of p	eriod)	Final	Repor	t?	expenditure (i.e.,	an expense	not conside	ered a contribution)	
Covered 12/01/2:	1 12/31/	21	Yes	No	x	supporting or oppo	sing a state	or local ca	<u>ndidate</u> ?	
RECEIPTS						*See next page		Yes	No	
 Previous total cash and in kir (if beginning a new campaigr 	nd contributions (From line 8 n or calendar year, see instru	, last C-4) uction book	det)					\$	\$8,320.83	
2. Cash received (From line 2, S	Schedule A)					··· _ \$	\$0.02			
3. In kind contributions received	d (From line 1, Schedule B)						\$0.00			
4. Total cash and in kind contrib	outions received this period ((Line 2 plus	s 3)						\$0.02	
5. Loan principal repayments m							\$0.00			
6. Corrections (From line 1 or 3	, Schedule C)			. Show	+ or (-	-)	\$0.00			
7. Net adjustments this period (Combine line 5 & 6)					Sho	w + or (-)		\$0.00	
8. Total cash and in kind contrib				')					\$8,320.85	
9. Total pledge payments due (From line 2, Schedule B)			\$0.	00					
EXPENDITURES										
Previous total cash and in kir (If beginning a new campaigr	nd expenditures (From line 1 n or calendar year, see instru	7, last C-4 uction book) klet)				·····		\$6,997.58	
11. Total cash expenditures (Fro	m line 4, Schedule A)					··· \$1,	300.00			
12. In kind expenditures (goods & services) (From line 1, Schedule B)						\$0.00				
13. Total cash and in kind expen	ditures made this period (Lir	ne 11 plus	line 12)						\$1,300.00	
14. Loan principal repayments m	ade (From line 2, Schedule	L)					\$0.00			
15. Corrections (From line 2 or 3	, Schedule C)			. Show	+ or (-	-)	\$0.00			
16. Net adjustments this period (Combine lines 14 & 15)					Sho	w + or (-)		\$0.00	
17. Total cash and in kind expen				and 16)				\$8,297.58	
CANDIDATES ONLY Won Lost U		H SUMMA Sash on hai		R minus	s line 1	7)			\$23.27	
						nce(s) plus your petty cash			7-00-1	
Primary election		19. Liabilities: (Sum of loans and debts owed)							\$0. 00	
Treasurer's Daytime Telephone No.: 20. Balance (Surplus or deficit) (Line 18) (206) 475-6827					18 minus line 19)			\$23.27		
	formation Lands						-	1 1	720.27	
CERTIFICATION: I certify that the in Candidate's Signature	formation herein and on accomp Date	panying sche	edules and Treasure				e best of my l	knowledge.	Date	
RMEN PAPYAN 01/05/22 April Lai						0	1/05/22			

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

F	1
(11/	93)

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

Report Date

(Friends of Armen Pa	apyan)				12/01/21	12/31/21	
1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.							
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits	
12/10/2021	\$0.02						
2. TOTAL CASH RECEIPTS				Enter als	so on line 2 of C4	\$ \$0.02	

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or 1) committee, identify the candidate or committee in the Description block;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE **DEFINITIONS** ON NEXT PAGE

- C Contributions (monetary, in-kind & transfers)
- I Independent Expenditures
- L Literature, Brochures, Printing
- B Broadcast Advertising (Radio, TV)
- N Newspaper and Periodical Advertising
- O Other Advertising (yard signs, buttons, etc.)
- V Voter Signature Gathering

- P Postage, Mailing Permits
- S Surveys and Polls
- F Fundraising Event Expenses
- T Travel, Accommodations, Meals M - Management/Consulting Services
- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount	
N/A	Expenses of \$50 or less	N/A	N/A		
12/20/21	ARA PAPYAN 5604 S 150th St Tukwila, WA 98188	C	Transfer to surplus funds account		\$500.00
12/20/21	ARMEN PAPYAN 5604 S 150th ST Tukwila, WA 98188	C	Transfer to surplus funds account		\$300.00
12/20/21	VLADIMIR MIRONYUK 5604 s 150th st Tukwila, WA 98188	C	Transfer to surplus funds account		\$500.00
			Total from attached pages	\$	\$0.00

Enter also on line 11 of C4

\$1,300.00