



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: October 10, 2022

Subject: Kurtis Engle Enforcement Hearing Memorandum: PDC Case #111938

Allegations:

PDC staff alleges that Kurtis Engle, a candidate for Secretary of State in the 2022 election, violated of RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign as required by campaigns registered under the “Full Reporting” option.

Background:

- Kurtis Engle was a candidate for Secretary of State in the August 2, 2022 Primary Election and received 0.37% of the vote. Mr. Engle’s name will not appear on the November 8, 2022 General Election.
- Mr. Engle declared his candidacy for Secretary of State on May 20, 2022.
- On June 16, 2022, Kurtis Engle filed the C-1 report, selecting the “Full Reporting” option and listing himself as Treasurer and the only officer. **[Exhibit A]**
- On August 28, 2022, PDC staff received a complaint filed by Conner Edwards alleging that Kurtis Engle had violated of RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign as required by campaigns registered under the “Full Reporting” option. **[Exhibit B]**

- PDC staff sent notice of the complaint to Mr. Engle on September 1, 2022 and requested a response by September 15, 2022. **[Exhibit C]**
- When no response was received and no reporting was done, staff sent a second notice of the complaint to Mr. Engle on September 16, 2022 and requested a response by September 26, 2022. **[Exhibit C]**
- On September 29, 2022, PDC staff served Kurtis Engle, by U.S. mail and electronic mail, with a hearing notice for a Brief Adjudicative Proceeding to be held on October 20, 2022, concerning alleged violations RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign as required by campaigns registered under the “Full Reporting” option. **[Exhibit D]**
- On October 3, 2022, PDC staff spoke to Mr. Engle by telephone. Mr. Engle requested to participate in the October 20, 2022 Brief Adjudicative Proceeding.
- On October 8, 2022, Kurtis Engle submitted a written response for PDC Case #111938. **[Exhibit E]**

Laws & Rules:

RCW 42.17A.235 and **RCW 42.17A.240** require candidates to file timely, accurate reports of contributions and expenditures. Under the “Full Reporting” option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions exceed \$200 since the last report; on the twenty-first day and the seventh day preceding the date of the primary and general election date; and on the tenth day of the first month after the primary and general election date.

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Exhibit List:

- **Exhibit A** – Candidate Registration (C-1 report) for Kurtis Engle, filed June 16, 2022
- **Exhibit B** – PDC Case #111938; Kurtis Engle Complaint; received August 28, 2022
- **Exhibit C** – Original Notice of Complaint; sent electronically on September 1, 2022 & Second Notice of Complaint; sent electronically on September 16, 2022
- **Exhibit D** – Brief Adjudicative Proceeding (Brief Enforcement Hearing) Notice; dated September 29, 2022
- **Exhibit E**– Written Response from Kurtis Engle; received October 8, 2022

EXHIBIT A



EDIT COMMITTEE



CANDIDACY

— UNVERIFY

AMEND



COPY



Admin Data

Committee Category: Candidate

Kurtis Anthony Engle

Engle for Secretary of State
2316 Westlake Dr SE
Lacey, WA 98503
kurtis.Engle@gmail.com
13605595730

Registration Filed

Candidate
Full Reporting
Submitted date: 06/16/2022
Certified by kurtis.Engle@gmail.com
2022
ENGLK 531

Candidacy

Kurtis Anthony Engle
State of Washington
Secretary Of State
The National Union Party
kurtis.Engle@gmail.com

Bank Information

Umpqua

749 Sleater Kinney Rd SE

Lacey, WA 98503

To schedule books review contact kurtis.enge@gmail.com

Officers

Kurtis Engle

Candidate

Treasurer

2316 Westlake Dr SE




Lacey, WA 98503

kurtis.enge@gmail.com

13605595730

Candidate is treasurer.

Registration attachments

Name	Description	Document Type	Actions
No data available			
Rows per page: 10  -  			

Committee attachments




Name	Description	Submitted At	Document Type	Actions
No data available				
Rows per page: 10  -  				

EXHIBIT B

Respondent Names
Kurtis Engle
Complainant Name
Conner Edwards
Complaint Description
Conner Edwards Sun, 28 Aug 2022 at 4:20 PM See complaint.
What impact does the alleged violation(s) have on the public?
List of attached evidence or contact information where evidence may be found
List of potential witnesses with contact information to reach them
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that <u>information provided with this complaint is true and correct to the best of my knowledge and</u> belief.

Hello:

The committee “Kurtis Engle” (2022) appears to have failed to timely file C4s.

This candidate filed as “full-reporting” however has not filed a single C3 or C4 report. This candidate would have been required to file a May C4 report because of the filing fee for this office being greater than \$200, and of course would have been required to file both the 21-day and 7-day pre-election report because they were on the ballot in the primary. See attached.

Letter to Respondent

To Whom It May Concern:

I apologize for filing this complaint against your campaign/committee. It is not my intention to cause you any inconvenience. I am filing a batch of complaints against campaigns/committees that have failed to timely file C4s in recent election cycles to demonstrate the PDC’s unwillingness to meaningfully enforce the statutory requirement to timely file C4s described in RCW 42.17A.235.

This is a relevant issue because the PDC appears poised to propose dramatically increasing the number of C4s that filers would be required to file in the month leading up to the primary and general elections. If this proposal were to be adopted by the Legislature, it would dramatically increase the amount of work that campaign treasurers and committees would be required to perform. The agency has offered little in the way of evidence to suggest that this proposal would result in any meaningful benefit to the voting public.

Currently, the agency does not actively investigate campaigns/committees to determine whether they have timely filed C4 forms. The agency *does* do this as it relates to the timely filing of C1/F1 forms. When adjudicating complaints alleging late C4 reporting, the PDC has leaned heavily on the use of “warning letters”. These letters are, in essence, dismissals, and are not a meaningful deterrent for those who would engage in late reporting.

Put simply, the agency’s rhetoric (“C4s contain valuable information for voters; any additional burden to filers stemming from increased reporting is justified”) does not match the agency’s actions (dismissing complaints that demonstrate filers haven’t filed C4 reports on time).

By highlighting the agency’s failure to meaningfully enforce current reporting deadlines, my hope is that the agency will look to improve its own enforcement procedures before saddling filers with additional reporting obligations.

No campaign treasurer or campaign/committee is perfect. Trying to comply with the myriad of requirements and deadlines the PDC enforces can be extremely difficult, even for those who have been doing this for years. The agency could adopt any number of strategies to help filers “get it right” when it comes to deadlines and other requirements. Some of these strategies might include: a) automated electronic filing reminders to a filer when they have missed a deadline, b) mandatory attendance in a PDC training course before a person is allowed to serve as treasurer, and c) giving filers 48 hours to file 21- & 7-day pre-election reports as opposed to the 24 hours we currently get.

Sincerely,

Conner Edwards
Campaign Treasure



Kurtis Anthony Engle

Engle for Secretary of State
2316 Westlake Dr SE
Lacey, WA 98503
kurtis.engle@gmail.com
13605595730

Registration Filed

Candidate
Full Reporting
Submitted date: 2022-06-16
Certified by kurtis.engle@gmail.com
2022
ENGLK 531

Candidacy

Kurtis Anthony Engle
State of Washington
Secretary Of State
The National Union Party
kurtis.engle@gmail.com

Bank Information

Umpqua
749 Sleater Kinney Rd SE
Lacey, WA 98503
To schedule books review contact kurtis.engle@gmail.com

Officers

Kurtis Engle

Candidate
Treasurer
2316 Westlake Dr SE
Lacey, WA 98503
kurtis.engle@gmail.com
13605595730

Candidate is treasurer.

Attachments

Name	Description
<hr/>	



PDC staff is working remotely

The PDC remains available for remote assistance, consistent with the governor's emergency proclamations. Please contact us for assistance at (360) 753-1111 or pdcc@pdcc.wa.gov.

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Kurtis Engle - 2022

Candidate Information

Office:

SECRETARY OF STATE

Jurisdiction:

State of Washington

Party:

OTHER

Registration:

June 16, 2022

Address:

2316 Westlake Dr SE
Lacey, WA 98503

Email:

kurtis.Engle@gmail.com

Phone:

13605595730

Financial Information

No data available.

Status

Primary**Election Status:**

Lost in primary

Campaign**Status:**

Candidate
declared

Reports

[Candidate's
Personal Financial
Affairs disclosure](#)

[Candidate's
surplus funds
account](#)

Independent Expenditures

spending for and against this candidate

Independent expenditures are made by third parties that are not part of a candidate's campaign.

No Independent Expenditures reported

See Independent Expenditures

Debts

incurred by candidate

This information shows the debt for the campaign as of the submission date of the related report.

Outstanding debt for campaign is \$0.00

See Debts

Campaign Finance Reports

See the reports filed by the candidate. Reports with a strikethrough were amended by another report.

No reports found for this candidate

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Secretary of State

Last updated on 08/16/2022 4:29 PM

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Candidate		Vote	Vote %
Bob Hagglund	(Prefers Republican Party)	225,633	12.05%
Kurtis Engle	(Prefers Union Party)	6,887	0.37%
Marquez Tiggs	(Prefers Democratic Party)	148,716	7.94%
Tamborine Borrelli	(Prefers America First (R) Party)	86,748	4.63%
Steve Hobbs	(Prefers Democratic Party)	747,993	39.93%
Keith L. Wagoner	(Prefers Republican Party)	227,842	12.16%
Mark Miloscia	(Prefers Republican Party)	187,774	10.02%
Julie Anderson	(Prefers Nonpartisan Party)	240,035	12.81%
WRITE-IN		1,499	0.08%
Total Votes		1,873,127	

EXHIBIT C

Jennifer Hansen

replied

a month ago (Thu, 1 Sep 2022 at 7:53 AM)

To:kurtis.engle@gmail.com

Hello Kurtis Engle,

The Public Disclosure Commission received a complaint from Conner Edwards on August 28, 2022, which has been assigned PDC Case Number 111938.

The Complaint alleges the following:

- **Alleged Violations of RCW 42.17A.235 & .240 for failure to timely & accurately disclose contributions & expenditures on C-3 and C-4 reports.**

Please review the attached complaint and provide your response by **Thursday, September 15, 2022**.

I can see from reviewing our records that you filed a C-1 (Candidate Registration) choosing the "Full Reporting" option but have not submitted any Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign. Under the "Full Reporting" option you are required to submit frequent campaign reports.

You may review our guides and instructions at the website (<https://www.pdc.wa.gov/registration-reporting>).

If further assistance filing or amending reports beyond the guides and videos is needed, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

For more information about the enforcement process, please see our [Enforcement Guide](#).

If you have any questions, please reply to this email.

Thank you,

Jennifer Hansen (she/her)
Compliance Officer
Public Disclosure Commission
pdc@pdc.wa.gov

1.360.586.4560

****Please click Reply when responding to this email**

Jennifer Hansen

replied

24 days ago (Fri, 16 Sep 2022 at 8:03 AM)

To:kurtis.engle@gmail.com

Mr. Engle:

I am following up regarding the response to a complaint filed by Conner Edwards on August 28, 2022 alleging violations of RCW 42.17A.235 and .240 for failing to file C-3 and C-4 reports as required for campaigns choosing the "Full Reporting" option on the C-1 report (candidate registration. Although you are not required to submit a response, it is helpful for me to include any mitigating circumstances prior to determining an appropriate resolution.

I encourage you to file the missing reports immediately. Staff is available to assist you with your filing obligations.

Please review the attached complaint and provide a response by **Monday, September 26, 2022**.

Jennifer Hansen (she/her)
Compliance Officer
Public Disclosure Commission
pdc@pdc.wa.gov
1.360.586.4560

****Please click Reply when responding to this email**

EXHIBIT D



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112 Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

September 29, 2022

Kurtis Engle
2316 Westlake Dr SE
Lacey WA 98503

Also delivered electronically to Kurtis Engle at "kurtis.engle@gmail.com"

Subject: Kurtis Engle; PDC Case Number 111938

The Public Disclosure Commission (PDC) is investigating a complaint filed on August 28, 2022 by Conner Edwards. The complaint alleges that you, a candidate in the 2022 election for Secretary of State, may have violated RCW 42.17A.235 & .240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign as required by campaigns registered under the "Full Reporting" option.

In accordance with RCW 42.17A.110 and RCW 42.17A.755, a Brief Adjudicative Proceeding (Brief Enforcement Hearing) has been scheduled to determine if you violated RCW 42.17A.235 & .240 by failing to timely and accurately file C-3 and C-4 reports. Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with WAC 390-37-143, a penalty schedule adopted by the Commission (see enclosed copy).

BRIEF ENFORCEMENT HEARING NOTICE

Date and time:	Thursday, October 20, 2022 at 1:00 p.m.
Place:	Remotely from Olympia Live Audio and Online Transmission
Presiding Officer:	Public Disclosure Commission
Authority:	RCW 42.17A and WAC 390



You are not required by law to attend the hearing. However, the Public Disclosure Commission recommends that respondents appear whenever possible.

PARTICIPATING VIA MICROSOFT TEAMS

The Enforcement Hearing will be audio and video recorded. Some Commission members and staff will be in-person at the PDC office in Olympian and some will join the meeting remotely.

PLEASE READ THE ENTIRE INSTRUCTION Prior to joining the meeting

How to participate remotely in the Washington State Public Disclosure Commission Meeting on October 20, 2022:

Please note you may be prompted to download MS TEAMS App or use a supported browser: Microsoft Edge  or Chrome  for best performance.

Participation Remote via MS Teams

On the date of the meeting and at the designated agenda time you will Join:

Microsoft Teams meeting info for October 20, 2022

Join on your computer or mobile app [Click here to join the meeting](#)

Please remember to **Mute** yourself and turn your **camera off** when you are not talking.

If you experience technical difficulties with the MS Teams participation after the meeting has started at 1:00 p.m., call the PDC's main number 1-360-753-1111 and staff will try to assist you.

If you have any questions about the hearing process prior to the hearing date, please contact Jennifer Hansen by email at pdc@pdc.wa.gov.

Sincerely,

Jennifer Hansen
PDC Compliance Officer

Enclosure

WAC 390-37-143 Brief enforcement hearings (brief adjudicative proceeding)—Penalty schedule. The presiding officer may assess a penalty up to one thousand dollars upon finding a violation of chapter 42.17A RCW or Title 390 WAC.

(1) Base penalty amounts:

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to timely file an accurate and complete statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Candidate's failure to timely file an accurate and complete registration statement (C-1)/statement of financial affairs (F-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150 per report	\$150 - \$300 per report	\$300 - \$600 per report up to \$1,000
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150 per report	\$300 per report	\$600 per report up to \$1,000
Failed to file report by date of enforcement hearing.	\$250 per report	\$500 per report	consideration by full commission
Failure to timely file an accurate and complete lobbyist monthly expense report (L-2):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Failure to timely file an accurate and complete lobbyist employer report (L-3):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000
Failure to timely file accurate and complete disclosure reports:			
Political committee registration (C-1pc).	\$150	\$300	\$600
Statement of contributions deposit (C-3).	\$150	\$300	\$600
Summary of total contributions and expenditures (C-4).	\$150	\$300	\$600
Independent expenditures and electioneering communications (C-6).	\$150	\$300	\$600
Last minute contribution report (LMC).	\$150	\$300	\$600
Out-of-state committee report (C-5).	\$150	\$300	\$600
Annual report of major contributors (C-7).	\$150	\$300	\$600
Failure to timely file accurate and complete reports disclosing lobbying activities:			
Lobbyist registration (L-1).	\$150	\$300	\$600
Public agency lobbying report (L-5).	\$150	\$300	\$600
Grass roots lobbying report (L-6).	\$150	\$300	\$600

Violation	1st Occasion	2nd Occasion	3rd Occasion
Failure to file electronically.	\$350	\$650	\$1,000
Exceeding contribution limits.	\$150	\$300	\$600
Exceeding mini reporting threshold.	\$150	\$300	\$600
Failure to comply with political advertising sponsor identification requirements.	\$150	\$300	\$600
Failure to include required candidate's party preference in political advertising.	\$150	\$300	\$600
Failure to comply with other political advertising requirements, RCW 42.17A.330 through 42.17A.345.	\$150	\$300	\$600
Use of public facilities to assist a campaign for election or promote a ballot measure.	\$150	\$300	\$600
Treasurer's failure to timely file an accurate and complete annual treasurer's report (T-1):			
Filed report after hearing notice, but before enforcement hearing. Provided written explanation or appeared at hearing to explain mitigating circumstances. Did not enter into statement of understanding.	\$0 - \$150	\$150 - \$300	\$300 - \$600
Filed report after hearing notice, but before enforcement hearing. Did not enter into statement of understanding.	\$150	\$300	\$600
Failed to file report by date of enforcement hearing.	\$250	\$500	\$1,000

"Occasion" means established violation. Only violations in the last five years will be considered for the purpose of determining second and third occasions.

(2) In determining the appropriate penalty, the presiding officer may consider the nature of the violation and aggravating and mitigating factors, including:

(a) Whether the respondent is a first-time filer;

(b) The respondent's compliance history for the last five years, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;

(c) The respondent's unpaid penalties from a previous enforcement action;

(d) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period, or otherwise had a significant or material impact on the public;

(e) The amount of financial activity by the respondent during the statement period or election cycle;

(f) Whether the late or unreported activity was significant in amount or duration under the circumstances, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;

(g) Corrective action or other remedial measures initiated by respondent prior to enforcement action, or promptly taken when noncompliance brought to respondent's attention;

(h) Good faith efforts to comply, including consultation with PDC staff prior to initiation of enforcement action and cooperation with PDC staff during enforcement action, and a demonstrated wish to acknowledge and take responsibility for the violation;

(i) Personal emergency or illness of the respondent or member of his or her immediate family;

(j) Other emergencies such as fire, flood, or utility failure preventing filing;

(k) Sophistication of respondent or the financing, staffing, or size of the respondent's campaign or organization; and

(l) PDC staff, third-party vendor, or equipment error, including technical problems at the agency preventing or delaying electronic filing.

(3) The presiding officer has authority to suspend all or a portion of an assessed penalty under the conditions to be determined by that officer including, but not limited to, payment of the nonsuspended portion of the penalty within five business days of the date of the entry of the order in that case.

(4) If, on the third occasion, a respondent has outstanding penalties or judgments, the matter will be directed to the full commission for consideration.

(5) The presiding officer may direct a matter to the full commission if the officer believes one thousand dollars would be an insufficient penalty or the matter warrants consideration by the full commission. Cases will automatically be scheduled before the full commission for an enforcement action when the respondent:

(a) Was found in violation during a previous reporting period;

(b) The violation remains in effect following any appeals; and

(c) The person has not filed the disclosure forms that were the subject of the prior violation at the time the current hearing notice is being sent.

[Statutory Authority: RCW 42.17A.110(1) and 2018 c 304. WSR 18-24-074, § 390-37-143, filed 11/30/18, effective 12/31/18. Statutory Authority: RCW 42.17A.110(1) and 42.17A.570. WSR 18-10-088, § 390-37-143, filed 5/1/18, effective 6/1/18. Statutory Authority: RCW 42.17A.110. WSR 17-03-004, § 390-37-143, filed 1/4/17, effective 2/4/17.]

EXHIBIT E

[Kurtis.Engle](#) replied

Sat, 8 Oct 2022

To: "PDC Support" <pdcc@pdcc.wa.gov>

External Email

Too long didn't read. Here is the essay I wrote for the hearing October 20th. TXT file is the same, it's in case you might need to use that.

=====

I'm actually quite ill.

A few weeks before filing week I managed to get into the mail an essay I had been writing for a year. The subject matter kept kicking my *ss and chasing me off. I was writing the folks who alter Navy records about changing mine. To do that I had to say why, and to do that I had to THINK, long, hard, and carefully, about things that happened long ago so awful I have refused to think about it for decades. Either those officers were able to hate that much and that easily, or they forgot they were punishing me, and so it just went on forever. Either would be more disturbing than the other. But what hit me in the eye was the shadow the incident cast over the rest of my life. The cost is incredible, and being able to see that clearly is new. I was always afraid to look, before. This triggered an attack of my severe, recurrent, depression. Add to this 4 surgeries and a root canal, this year, and another surgery in a month. A bit distracting.

I get paid \$51,000, this year, due to some of these matters. That is the source of all of my funds. I expect the essay to be worth about \$100,000 and about \$20,000 annually, so, important. I have never requested or accepted a political donation. I'm not a politician. I filed in this race because it was possible there would be an argument about trusting our voting system. As it turned out there was little of that, here. I was pleased to have the luxury of addressing personal matters instead (if I can put it that way). I am pleased by the way the election turned out and would vote for either of the remaining SOS candidates.

Regarding the PDC reporting and related hearings, there were three items I found non-functional. Two of these relate to disability, the last is just plain bad equipment.

First, the format of what amounts to Flash Cards deprives the victim of all landmarks and any sense of where he is going, how long the journey, and what is under his foot until he plants it. While some might not be bothered, others are. I think that someone thought of this as a cruel joke. If that is not so, then I would like to tell you that it is a cruel joke. In future adopt a format that allows the victim to see the entire problem on one page. Electric paper rolls on forever. You have no excuse.

Second, I came upon a question that would take a minute to answer, were it worded differently. As it was, it would take a month to answer. And the deadline, and the fact I am supposedly trying to get elected, thus 'busy', argues strenuously that I should just lie. After all, you aren't going to check. That thought bounces directly off the main point of the essay I wrote to the Navy Records department. Those officers did me all but in because I pushed back on busywork, on a nuclear submarine. Which one? The one that sank a lot because no one had done the maintenance for years. Because they were doing busywork. Long story short, I have a deep-seated psychiatric aversion to busywork. In future,

please ask folks for their brokerage account numbers and do the busywork for us. You can do it in seconds, while it would take us a month. Or... ask in a way it can be answered in a minute.

Third, Microsoft Teams is a non-legal choice to conduct government business on because Microsoft insists I prove who I am to them. To the extent microsoft maintains a database of peoples particulars it is an offense not a service. And the extent of their maintenance is limited. I would have to do three impossible things to prove who I am. Sending me a link via email should adequately establish my identity to attend a government hearing.

In conclusion, I mention I paid the fine and consider the matter settled. If that isn't so, I would mention that is because I wasn't allowed to attend the hearing.

Thanks very much.