



**STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION**

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

**BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON**

In RE COMPLIANCE WITH  
RCW 42.17 and RCW 42.17A

William Campbell

Respondent.

PDC Case 115649

Report of Investigation

**I.**

**Factual Background and Complaint**

- 1.1 On April 27, 2022, Richard “Rick” Kuss filed a Candidate Registration (C-1 report) declaring his candidacy for Kitsap County Sheriff, selecting the Full Reporting option and listing himself as Treasurer and the only officer.
- 1.2 During the November 8, 2022 general election, Mr. Kuss lost to his opponent, John Gese, after receiving 41.82% of the total votes cast.
- 1.3 On November 29, 2022, the Kitsap County general election results were certified.
- 1.4 On or about December 1, 2022, a group of six registered voters, including William Campbell, Marianne and Michael Gustavson, Martha Mioni, Gerald Chaney and Ron Rice, submitted a written request for a recount of the November 2022 election for Kitsap County Sheriff. Ex. 2, p. 6. The Respondent, William Campbell, acted as chairman.
- 1.5 These voters were all supporters of Rick Kuss. Ex. 5, p. 2. The Respondent had personally contributed \$552 to the Kuss campaign. Ex. 3, p. 1. Additionally, the Respondent personally spoke with Mr. Kuss about the recount, and understood that Mr. Kuss was supportive of the effort. Ex. 9, p. 12.
- 1.6 To fund the recount, the Respondent provided a \$31,060.50 cash deposit to the Kitsap County Auditor. Ex. 7. The Respondent spent \$31,010.50 of his personal funds towards the \$31,060.50 total deposit. Martha Mioni donated the remaining \$50. Ex. 9, p. 7; Ex. 6, p. 17; Ex. 11.

- 1.7 The Respondent was reimbursed \$1,000 by Marianne and Michael Gustavson. Ex. 9, p. 7.
- 1.8 The results of the manual recount changed six votes, with five additional votes counted for Rick Kuss and one for John Gese.
- 1.9 On December 26, 2022, PDC staff received a complaint (the Complaint) alleging that, by engaging in the above-described conduct, the Respondent acted as a political committee and so violated: (1) RCW 42.17A.205 by failing to file the Committee Registration Statement (C-1pc) due within two weeks of becoming a political committee; and (2) RCW 42.17A.235 and RCW 42.17A.240 by failing to timely disclose monetary contributions received on Monetary Contributions reports (C-3 reports), and by failing to timely disclose expenditures made on Summary Full Campaign Contribution and Expenditure reports (C-4 reports). Ex. 1.

## **II.**

### **Investigative Findings**

- 2.1 On December 5, 2022, prior to when the PDC received the Complaint, the Respondent contacted PDC Staff to inquire about whether his group needed to register as a political committee. Ex. 5, p.2. In his inquiry, the Respondent stated “I am not part of a political party or campaign, however am biased in favor of Mr. Kuss []. The other five registered voters share my bias.” Ex. 5, p.2. The Respondent also told PDC Staff that he and the other members of the group “pooled the money” for the recount effort. Ex. 5, p.2.
- 2.2 Upon reviewing PDC Staff’s guidance, the Respondent asserted that his group did not meet the definition of a “political committee” as defined by RCW 42,17A.005(41). Ex. 5, p. 13.
- 2.3 After receiving the Complaint, PDC Staff requested more information from the Respondent about the nature of his group’s recount effort. In his January 20, 2023, response, the Respondent told PDC Staff that he was introduced to the recount effort via a social media post with a link to a GiveSendGo online fundraiser. The fundraising page, <https://www.givesendgo.com/RecountKitsap>, stated that the campaign was created by “Friends of Rick Kuss,” which is not a committee registered with the PDC. Ex. 4.
- 2.4 The GiveSendGo recount fundraiser was advertised by a social media account linked to Mr. Kuss’s campaign. Ex. 5, p. 10.
- 2.5 The Respondent told PDC Staff that he provided his contact information to the person who had posted the GiveSendGo link and expressed his desire to provide a donation to the recount effort without using a credit card. He stated that he was invited to a small gathering to discuss the recount effort and, after learning of RCW 29A.64.011<sup>1</sup>, he

---

<sup>1</sup> This statute states, in relevant part, “[a]ny group of five or more registered voters may file a written application for a recount of the votes or a portion of the votes cast *upon any question or issue.*” (Emphasis added). The statute

agreed to be chairman of a group including himself and five other registered voters. Ex. 2, p.6. As chairman, the Respondent committed to preparing the written request for the recount. Exhibit 2, p. 6.

- 2.6 The group met again on the evening of November 30, 2022, to review the written recount request and to pool their cash for the accompanying deposit. Exhibit 2, p. 6. At some point the Respondent became aware that about 30% of the deposit was funded from credit card loans and, due to personal conviction, he returned that money and replaced it with his own funds. Thus, the Respondent reported spending \$31,010.50 of his personal funds towards the \$31,060.50 total deposit. Martha Mioni donated the remaining \$50. Ex. 9, p. 7; Ex. 6, p. 17; Ex. 11.
- 2.7 After reviewing the Respondent's initial statement, PDC staff sought to obtain more information regarding the source of funds for the recount. On March 1, 2023, the Respondent submitted a written response to PDC staff stating that he used \$30,010.50 of his personal funds, while \$1,050 was contributed by three members of the recount group. Exhibit 8.
- 2.8 On March 22, 2023, the PDC held an Initial Hearing (Case Status Review Hearing), after opening a formal investigation for PDC Case 115649 concerning the Respondent.
- 2.9 On June 26, 2023, the Respondent met with PDC Compliance Officer Jennifer Hansen. During this meeting, the Respondent provided the following information that was not previously included in his written responses: (1) after first not recalling whether Kuss was supportive, the Respondent recalled attending a canvassing board meeting along with approximately one dozen other attendees including Rick Kuss where he spoke briefly with Kuss; Exhibit 6, p. 4 and (2) the Respondent confirmed that the group requesting the recount included the five registered voters who signed the official request and specifically added that one of those voters made the \$50 donation towards the \$31,060.50 total deposit paid along with the request. Exhibit 6, p. 18, 19. The Respondent's statement was recorded for clarity but not made under oath.
- 2.10 On February 14, 2024, in response to a subpoena, the Respondent appeared at the PDC offices in Olympia for an additional interview with PDC Compliance Officer Jennifer Hansen. The interview was recorded, and the Respondent affirmed that his statements were truthful. Exhibit 9.
- 2.11 During this interview, the Respondent confirmed that he received a \$1,000 check to reimburse him for the recount deposit from the account of Marianne & Michael A.

---

apparently limits the ability of registered voters to request a recount to "any question or issue," whereas a candidate or political party may request a recount of "the votes or a portion of the votes *cast at that election for all candidates for election to that office.*" (Emphasis added). Thus, it is questionable whether the Respondent and his group had the legal authority to request a recount of the Kitsap County Sheriff's Race in the first place.

Gustavson and that he cashed the check sometime during the first two weeks of December 2022. Ex. 9, p. 7-8.

- 2.12 The Respondent originally told PDC Staff that no political parties were involved in the request for the recount, and that he wasn't sure if Mr. Kuss was personally supportive. Ex. 2, p. 5; Ex. 6, p. 19. However, in response to the subpoena, the Respondent admitted that he attended a canvassing board meeting where he met Mr. Kuss and asked him whether he was in favor of the recount. Ex. 9, p. 12. Mr. Kuss stated that he was in favor. *Id.*
- 2.13 Separately, Mr. Kuss told a reporter for the Kitsap Sun that he "helped the group raise money" for the recount effort. Ex. 1, p. 9.
- 2.14 On April 23, 2024, the Respondent provided a copy of check #2410 dated November 30, 2022, signed by Michael A. Gustavson in the amount of \$1,000 and made payable to William B. Campbell. Exhibit 10.

### **III.** **Scope**

- 3.1 PDC staff reviewed the following:
  - 1. Complaint filed by Conner Edwards on December 26, 2022.
  - 2. William Campbell's written response to the complaint submitted on January 20, 2023, and his written response to questions from staff on March 1, 2023.
  - 3. Verbal testimony provided by William Campbell during interviews on June 26, 2024, and February 14, 2024.
  - 4. Email communication between William Campbell and PDC staff on December 5, 2022, regarding potential reporting obligations for the recount effort, including staff's recommendation to register as a political committee.
  - 5. Written request for recount of 2022 Kitsap County Sheriff's race signed by William Campbell, Marianne & Michael Gustavson, Martha Mioni, Gerald Chaney and Ron Rice, and the receipt of \$31,060.50 deposit from Kitsap County.
  - 6. PDC report disclosing a monetary contribution from William Campbell to the 2022 Kuss Campaign.
  - 7. Telephone conversations with Martha Mioni and Michael Gustavson regarding donations provided to William Campbell.



#### IV. Relevant Law

RCW 42.17A.005(41) defines "Political committee" as any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.

RCW 42.17A.205 requires that "Every political committee shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A political committee organized within the last three weeks before an election and having the expectation of receiving contributions or making expenditures during and for that election campaign shall file a statement of organization within three business days after its organization or when it first has the expectation of receiving contributions or making expenditures in the election campaign."

RCW 42.17A.235 and RCW 42.17A.240 require political committees 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 or expenditures exceed \$200 since the last report; on the twenty-first day and the seventh day immediately preceding the date on which the election is held; and on the tenth day of the first month after the election.

#### **RCW 42.17A.205 Statement of organization by political committees.**

(1) Every political committee shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A political committee organized within the last three weeks before an election and having the expectation of receiving contributions or making expenditures during and for that election campaign shall file a statement of organization within three business days after its organization or when it first has the expectation of receiving contributions or making expenditures in the election campaign.

(2) The statement of organization shall include but not be limited to:

- (a) The name, address, and electronic contact information of the committee;
- (b) The names, addresses, and electronic contact information of all related or affiliated committees or other persons, and the nature of the relationship or affiliation;
- (c) The names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders;
- (d) The name, address, and electronic contact information of its treasurer and depository;
- (e) A statement whether the committee is a continuing one;

- (f) The name, office sought, and party affiliation of each candidate whom the committee is supporting or opposing, and, if the committee is supporting the entire ticket of any party, the name of the party;
  - (g) The ballot proposition concerned, if any, and whether the committee is in favor of or opposed to such proposition;
  - (h) What distribution of surplus funds will be made, in accordance with RCW [42.17A.430](#), in the event of dissolution;
  - (i) Such other information as the commission may by rule prescribe, in keeping with the policies and purposes of this chapter;
  - (j) The name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate or committee; and
  - (k) The name, address, and title of any person who is paid by or is a volunteer for a candidate or political committee to perform ministerial functions and who performs ministerial functions on behalf of two or more candidates or committees.
- (3) No two political committees may have the same name.
  - (4) Any material change in information previously submitted in a statement of organization shall be reported to the commission within the ten days following the change.
  - (5) As used in this section, the "name" of a sponsored committee must include the name of the person who is the sponsor of the committee. If more than one person meets the definition of sponsor, the name of the committee must include the name of at least one sponsor, but may include the names of other sponsors. A person may sponsor only one political committee for the same elected office or same ballot proposition per election cycle.

**RCW 42.17A.235 Reporting of contributions and expenditures—Public inspection of accounts.**

- (1)(a) In addition to the information required under RCW [42.17A.205](#) and [42.17A.210](#), each candidate or political committee must file with the commission a report of all contributions received and expenditures made as a political committee on the next reporting date pursuant to the timeline established in this section.
- (b) In addition to the information required under RCW [42.17A.207](#) and [42.17A.210](#), on the day an incidental committee files a statement of organization with the commission, each incidental committee must file with the commission a report of any election campaign expenditures under \*RCW [42.17A.240](#)(6), as well as the source of the ten largest cumulative payments of ten thousand dollars or greater it received in the current calendar year from a single person, including any persons tied as the tenth largest source of payments it received, if any.
- (2) Each treasurer of a candidate or political committee, or an incidental committee, required to file a statement of organization under this chapter, shall file with the commission a report, for each election in which a candidate, political committee, or incidental committee is participating, containing the information required by RCW [42.17A.240](#) at the following intervals:
  - (a) On the twenty-first day and the seventh day immediately preceding the date on which the election is held; and

(b) On the tenth day of the first full month after the election.

(3)(a) Each treasurer of a candidate or political committee shall file with the commission a report on the tenth day of each month during which the candidate or political committee is not participating in an election campaign, only if the committee has received a contribution or made an expenditure in the preceding calendar month and either the total contributions received or total expenditures made since the last such report exceed two hundred dollars.

(b) Each incidental committee shall file with the commission a report on the tenth day of each month during which the incidental committee is not otherwise required to report under this section only if the committee has:

(i) Received a payment that would change the information required under RCW [42.17A.240](#)(2)(d) as included in its last report; or

(ii) Made any election campaign expenditure reportable under \*RCW [42.17A.240](#)(6) since its last report, and the total election campaign expenditures made since the last report exceed two hundred dollars.

(4) The report filed twenty-one days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report. The report filed seven days before the election shall report all contributions received and expenditures made as of the end of one business day before the date of the report. Reports filed on the tenth day of the month shall report all contributions received and expenditures made from the closing date of the last report filed through the last day of the month preceding the date of the current report.

(5) For the period beginning the first day of the fourth month preceding the date of the special election, or for the period beginning the first day of the fifth month before the date of the general election, and ending on the date of that special or general election, each Monday the treasurer for a candidate or a political committee shall file with the commission a report of each bank deposit made during the previous seven calendar days. The report shall contain the name of each person contributing the funds and the amount contributed by each person. However, persons who contribute no more than twenty-five dollars in the aggregate are not required to be identified in the report. A copy of the report shall be retained by the treasurer for the treasurer's records. In the event of deposits made by candidates, political committee members, or paid staff other than the treasurer, the copy shall be immediately provided to the treasurer for the treasurer's records. Each report shall be certified as correct by the treasurer.

(6)(a) The treasurer for a candidate or a political committee shall maintain books of account accurately reflecting all contributions and expenditures on a current basis within five business days of receipt or expenditure. During the ten calendar days immediately preceding the date of the election the books of account shall be kept current within one business day. As specified in the political committee's statement of organization filed under RCW [42.17A.205](#), the books of account must be open for public inspection by appointment at a place agreed upon by both the treasurer and the requestor, for inspections between 9:00 a.m. and 5:00 p.m. on any day from the tenth calendar day immediately before the election through the day immediately before the election, other than Saturday, Sunday, or a legal holiday. It is a violation of this chapter for a candidate or political committee to refuse to allow and keep an appointment for an inspection to be conducted during these authorized times and days. The appointment must be allowed at an authorized time and day for such inspections that is within forty-eight hours of the time and day

that is requested for the inspection. The treasurer may provide digital access or copies of the books of account in lieu of scheduling an appointment at a designated place for inspection. If the treasurer and requestor are unable to agree on a location and the treasurer has not provided digital access to the books of account, the default location for an appointment shall be a place of public accommodation selected by the treasurer within a reasonable distance from the treasurer's office.

(b) At the time of making the appointment, a person wishing to inspect the books of account must provide the treasurer the name and telephone number of the person wishing to inspect the books of account. The person inspecting the books of account must show photo identification before the inspection begins.

(c) A treasurer may refuse to show the books of account to any person who does not make an appointment or provide the required identification. The commission may issue limited rules to modify the requirements set forth in this section in consideration of other technology and best practices.

(7) Copies of all reports filed pursuant to this section shall be readily available for public inspection by appointment, pursuant to subsection (6) of this section.

(8) The treasurer or candidate shall preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred or for any longer period as otherwise required by law.

(9) All reports filed pursuant to subsection (1) or (2) of this section shall be certified as correct by the candidate and the treasurer.

(10) Where there is not a pending complaint concerning a report, it is not evidence of a violation of this section to submit an amended report within twenty-one days of filing an initial report if:

(a) The report is accurately amended;

(b) The amended report is filed more than thirty days before an election;

(c) The total aggregate dollar amount of the adjustment for the amended report is within three times the contribution limit per election or two hundred dollars, whichever is greater; and

(d) The committee reported all information that was available to it at the time of filing, or made a good faith effort to do so, or if a refund of a contribution or expenditure is being reported.

(11)(a) When there is no outstanding debt or obligation, the campaign fund is closed, the campaign is concluded in all respects, and the political committee has ceased to function and intends to dissolve, the treasurer shall file a final report. Upon submitting a final report, the political committee so intending to dissolve must file notice of intent to dissolve with the commission and the commission must post the notice on its website.

(b) Any political committee may dissolve sixty days after it files its notice to dissolve, only if:

(i) The political committee does not make any expenditures other than those related to the dissolution process or engage in any political activity or any other activities that generate additional reporting requirements under this chapter after filing such notice;

- (ii) No complaint or court action under this chapter is pending against the political committee; and
  - (iii) All penalties assessed by the commission or court order have been paid by the political committee.
  - (c) The political committee must continue to report regularly as required under this chapter until all the conditions under (b) of this subsection are resolved.
  - (d) Upon dissolution, the commission must issue an acknowledgment of dissolution, the duties of the treasurer shall cease, and there shall be no further obligations under this chapter. Dissolution does not absolve the candidate or board of the committee from responsibility for any future obligations resulting from the finding after dissolution of a violation committed prior to dissolution.
- (12) The commission must adopt rules for the dissolution of incidental committees.

**RCW 42.17A.240 Contents of report.**

Each report required under RCW [42.17A.235](#) (1) through (4) must be certified as correct by the treasurer and the candidate and shall disclose the following, except an incidental committee only must disclose and certify as correct the information required under subsections (2)(d) and (7) of this section:

- (1) The funds on hand at the beginning of the period;
- (2) The name and address of each person who has made one or more contributions during the period, together with the money value and date of each contribution and the aggregate **value of** all contributions received from each person during the campaign, or in the case of a continuing political committee, the current calendar year, with the following exceptions:
  - (a) Pledges in the aggregate of less than one hundred dollars from any one person need not be reported;
  - (b) Income that results from a fund-raising activity conducted in accordance with RCW [42.17A.230](#) may be reported as one lump sum, with the exception of that portion received from persons whose names and addresses are required to be included in the report required by RCW [42.17A.230](#);
  - (c) Contributions of no more than twenty-five dollars in the aggregate from any one person during the election campaign may be reported as one lump sum if the treasurer maintains a separate and private list of the name, address, and amount of each such contributor;
  - (d) Payments received by an incidental committee from any one person need not be reported unless the person is one of the committee's ten largest sources of payments received, including any persons tied as the tenth largest source of payments received, during the current calendar year, and the value of the cumulative payments received from that person during the current calendar year is ten thousand dollars or greater. For payments to incidental committees from multiple persons received in aggregated form, any payment of more than ten thousand dollars from any single person must be reported, but the aggregated payment itself may not be reported. The commission may suspend or modify reporting requirements for payments received by an incidental committee in cases of manifestly unreasonable hardship under this chapter;

(e) Payments from private foundations organized under section 501(c)(3) of the internal revenue code to an incidental committee do not have to be reported if:

(i) The private foundation is contracting with the incidental committee for a specific purpose other than election campaign purposes;

(ii) Use of the funds for election campaign purposes is explicitly prohibited by contract; and

(iii) Funding from the private foundation represents less than twenty-five percent of the incidental committee's total budget;

(f) Commentary or analysis on a ballot proposition by an incidental committee is not considered a contribution if it does not advocate specifically to vote for or against the ballot proposition; and

(g) The money value of contributions of postage is the face value of the postage;

(3) Each loan, promissory note, or security instrument to be used by or for the benefit of the candidate or political committee made by any person, including the names and addresses of the lender and each person liable directly, indirectly or contingently and the date and amount of each such loan, promissory note, or security instrument;

(4) All other contributions not otherwise listed or exempted;

(5) A statement that the candidate or political committee has received a certification from any partnership, association, corporation, organization, or other combination of persons making a contribution to the candidate or political committee that:

(a) The contribution is not financed in any part by a foreign national; and

(b) Foreign nationals are not involved in making decisions regarding the contribution in any way;

(6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;

(7) The name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures. An incidental committee only must report on expenditures, made and reportable as contributions as defined in RCW [42.17A.005](#), to election campaigns. For purposes of this subsection, commentary or analysis on a ballot proposition by an incidental committee is not considered an expenditure if it does not advocate specifically to vote for or against the ballot proposition;

(8) The name, address, and electronic contact information of each person to whom an expenditure was made for soliciting or procuring signatures on an initiative or referendum petition, the amount of the compensation to each person, and the total expenditures made for this purpose. Such expenditures shall be reported under this subsection in addition to what is required to be reported under subsection (7) of this section;

(9)(a) The name and address of any person and the amount owed for any debt with a value of more than seven hundred fifty dollars that has not been paid for any invoices submitted, goods received, or services performed, within five business days during the period within thirty days before an election, or within ten business days during any other period.

(b) For purposes of this subsection, debt does not include regularly recurring expenditures of the same amount that have already been reported at least once and that are not late or outstanding;

- (10) The surplus or deficit of contributions over expenditures;
- (11) The disposition made in accordance with RCW [42.17A.430](#) of any surplus funds; and
- (12) Any other information required by the commission by rule in conformance with the policies and purposes of this chapter.

Respectfully submitted this 10th day of September, 2024.

*Electronically Signed Jennifer Hansen*

Jennifer Hansen

PDC Compliance Officer

### **List of Exhibits**

- Exhibit #1** Complaint filed with the PDC by Conner Edwards against William Campbell, received December 26, 2022.
- Exhibit #2** Response to complaint, submitted by William Campbell, on January 20, 2023.
- Exhibit #3** C-3 report submitted on September 19, 2022, by 2022 Kuss Campaign.
- Exhibit #4** Fundraising page <https://www.givesendgo.com/RecountKitsap> created by Friends of Rick Kuss.
- Exhibit #5** December 5, 2022, William Campbell request for PDC staff assistance (FreshDesk ticket #114625).
- Exhibit #6** June 26, 2023, transcript of recorded meeting with William Campbell and PDC Compliance Officer, Jennifer Hansen.
- Exhibit #7** Written request for recount & receipt from Kitsap County for cash deposit made by William Campbell on December 1, 2022.
- Exhibit #8** Supplemental response to complaint, submitted by William Campbell, on March 1, 2023.
- Exhibit #9** February 14, 2024, transcript of recorded interview with William Campbell conducted by Jennifer Hansen.
- Exhibit #10** Copy of personal check #2410 written on November 30, 2022, from the account of Marianne & Michael Gustavson payable to William Campbell in the amount of \$1,000 and deposited by Campbell via mobile deposit into his personal bank account.
- Exhibit #11** Written statement from Martha Mioni, received June 10, 2024, confirming \$50 cash donation given on November 30, 2022, to William Campbell.

# EXHIBIT 1



<b>Respondent Name</b>
Friends of Rick Kuss/William Campbell
<b>Complainant Name</b>
Conner Edwards
<b>Complaint Description</b>
<a href="#"><u>Conner Edwards</u></a> (Mon, 26 Dec 2022 at 11:06 PM)  See complaint.
<b>What impact does the alleged violation(s) have on the public?</b>
See complaint.
<b>List of attached evidence or contact information where evidence may be found</b>
See attached. Per website narrative, deposit of ~\$30,000 was made on or before 12/5/22. According to article, as of 12/20/22, respondent did not register committee. I also looked at committee registrations filed between then and now and did not find it.
<b>List of potential witnesses</b>
William Campbell.
<b>Certification (Complainant)</b>
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.

## Complaint

Please see the attached article from the Kitsap Sun.

In the article, the PDC's Deputy Director goes on the record in suggesting that the group that funded an official county ballot recount should register with the PDC and disclose the names of those who contributed to the recount effort.

When contacted by a media outlet on this issue, it would've been completely appropriate for agency staff to cite the relevant provisions of law and rule and describe the process that a complaint goes through. It also would've been completely appropriate for agency staff to flag this issue on the agenda for the January Commission meeting, provide their perspective to the Commission, and allow the Commissioners to discuss the issue and make an informed decision.

Instead, agency staff put their thumb on the scale and suggested publicly that the respondent had somehow violated state law by not filing with the PDC. How would you feel if you had engaged in conduct that has never been prohibited and then the staff of a state agency goes on record in a newspaper article and suggests you have done something illegal?

There is little in the law to suggest that this group would be required to disclose the names of those who contributed to the recount effort. It's not clear what benefit this disclosure would provide to the public: the money is not being used for the purpose of persuading voters, it is instead being used to pay county government to make sure a machine count of ballots was accurate pursuant to an official process.

Of course, I'm sure there may be some good arguments from agency staff suggesting that the names of those who donated to a recount effort *should* be disclosed to the PDC. They should make those arguments directly to the Commissioners and allow them to make an informed decision; this issue should not be litigated by agency staff in the media.

It is my hope that the Commissioners, and not agency staff, will settle this question and determine whether or not those who fund recounts must disclose their names to the PDC.

### **Note to Respondent:**

I apologize for filing this complaint against you. It is not my intention to cause you any inconvenience. This complaint is part of my effort to highlight and push back against agency guidance which often misstates or misinterprets state law and administrative rule. This guidance is issued unilaterally by staff, without any opportunity for members of the public to provide input or for the Commissioners to discuss the issue. While this guidance is not supposed to be binding, agency staff often treat it as if it were.

Under RCW 42.17A, the Commissioners are charged with interpreting state law and administrative rule and finding violations of the FCPA, not agency staff.

I hope that you will agree with me that the comments made by the Deputy Director to the press were not appropriate.

Best,

Conner Edwards  
Campaign Treasurer  
(425) 533-1677 cell

## Supporting Hand Recount for Election Integrity



Campaign Created by: **Friends of Rick Kuss**

Goal: **USD \$47,000**

Raised: **USD \$ 8,295**

The Bible teaches me that as a follower of my Lord and savior Jesus Christ, I am only a steward of the funds that God has entrusted to my care. This morning during my prayer time I was reminded that I am to trust Him in all things. I had freely given money to the group as a contribution and I willingly loaned additional money to the group effort. This morning the Lord gently reminded me that all I have is His and my desire to have some of His money returned to me through crowd source funding is, for me, a sin.

I appreciate the generous monetary contributions that have been made to this account but want you to know that I will not be requesting the use of any of these funds as reimbursement for any of the payment for the recount made in accordance with RCW 29A.64.011.

I do not know God's purpose for this recount. It may simply be the Lord publicly teaching me a lesson in humility and stewardship. I am certain that God's purpose is not to weigh in on an election result but rather, in some way, to bring people to the knowledge and faith Jesus came to earth, died on the cross, and was raised from the dead to restore the relationship He desires with every single one of us.

I covet your prayers as we go through this recount process. Please pray for John and Rick. They bear the image of God and He loves them both dearly. Please pray for the staff of the elections department as they have been asked to give their time and energy to the recount during this Christmas season when we celebrate the birth of our savior, Jesus Christ.

William Campbell

December 7, 2022

#### 12/10/2022 Update on Fundraiser:

We received the above communication from William Campbell earlier this week and responded that while we appreciate his desire to shift our focus from fundraising to prayer, the fundraiser provides a way for the community to show their support in a tangible way.

After several discussions he has agreed to accept repayment of the money he provided as a loan but will then consult with us to redirect the funds to individuals, organizations, or efforts engaged in discovering and resolving flaws or weaknesses in our election systems and processes. He stressed that none of the funds returned to him will be given to any political party or campaign.

#### 12/5/2022 Update on Fundraiser:

The election was certified November 29, 2022. The Recount request was filed on December 1, 2022 in accordance with RCW 29A.64.011.

We have spoken with the Auditor's office, and they tell us that we will have to put a security deposit down to get the process started. RCW 29A.64.030 requires a deposit of 25 cents for each ballot that is requested to be manually recounted, and there are 124,242 ballots in Kitsap. Then the Auditor's office has to setup a space (likely the Commissioner's chambers) to count the ballots. They said they need to do this to accommodate so many paid workers since the room they normally use to process ballots is too small. The number of paid workers they will use is unknown at this time, but they said likely close to 30. After setup of the ballots then they begin counting.

Once they are complete with the process and have our total then we will see if we owe them any more funds. RCW 29A.64.081 directs the canvassing board to determine the expenses for conducting a recount. If the costs of the recount exceed the deposit the applicant shall pay the difference. To meet the filing requirements the applicants for the recount have accepted the personal financial risk associated with the deposit and with the total cost of the recount being unknown.

We estimate that if they have 30 employees being paid \$30/hour (hourly wage + benefits) working 8-hour shifts then that is roughly \$7,200 per day for the counting portion (30 people x 8 hour shifts x \$30 per hour). This does

not include setup and breakdown.

The Auditor's Office continues to be transparent and has provided a good faith estimate of \$34,000 to perform the hand recount. The Office noted that a recount like the one we have requested has never been performed so there is some uncertainty in the accuracy of the estimate. Based on the explanation of the process used to arrive at the estimate we believe it is the minimum cost we can hope for. Allowing for the estimate to be exceeded by 40% and accounting for contributions that were used to make the deposit required by law when the recount request was submitted, we have revised our goal down to \$47,000.

RCW 29A.64.041 (2) allows us stop the count upon written request at any time. The deposit of \$31,060.50 was made by individual registered voters of Kitsap County using their own contributions and unsecured loans. The Auditor's Office is planning to provide us with updates of the total cost as the recount progresses. This will give the registered voters that requested the recount a financial escape path if all available funds are consumed before the recount is complete.

If we do have money left over we will save this money to be used for future hand recounts in other counties if needed. We want to ensure that we have clear evidence of trust in the voting system that we have in WA state and that will only be achieved through verification. No matter what side you are on, this should make sense.

We are asking WA state citizens to pledge to help keep election integrity in our state by donating for a hand recount of the Sheriff's race in Kitsap County. The HART intercivic machines that are used in Kitsap County are used in 16 counties in WA state so this look at these machines is a way to evaluate this system in 16 other counties in WA state.

How does the HART intercivic system work? It does not count paper ballots. Instead, ballots are scanned, and ballot images are saved. Then the images are read by the election system and tabulated. If the software is unable to read the ballot selections, the image/record is manipulated through adjudication, and then tabulated. Each step in the process, in terms of this description, is deemed an "event". Events are logged for each process within the system in real time. These logs are the record of events that take place within the system while processing and counting the votes. At 8 pm on election night, the voting machine tabulates all the votes to come up with the winners.

The end goal is not to overturn the election results, merely to trust but verify them. Your vote is more important than your money and you should have the same trust in your voting system as you do in your bank. We need to verify our voting system just like we would if we cashed a check at a bank. Do you count your money when you cash a check? Yes. Why? Because you trust the bank but you also verify that it is accurate. We want the same standard for our elections. Trust but verify.

We as registered voters of Kitsap County, want to gain confidence in the tabulation machines just as we do in a hand recount. Several people have stated that they are not voting based on a perceived lack of trust. We are uniting to verify the results and instill confidence in our election process.

We want to look closely at whether the results of the machine will match 100% with the hand count. If it doesn't, it will mean your vote does not matter and this voting system needs to be put into question.

How can you trust the system when your vote is not counted correctly?

We must ensure our vote matters and be able to trust the system that codifies our voices. This begins with one donation. Are you willing to donate for a full hand recount and ensure election integrity?

Thank you for your time and consideration.

### **Read less**



#### **UPDATES**

*Follow this campaign to get email notifications when the campaign owner posts an update.*

FOLLOW



#### **PRAYER REQUESTS**

Click the Pray Now button to let the campaign owner know you are praying for them.

PRAY

Recent Donations



**Gayle**

25 days ago

 2  0

USD \$  
25

**Kenneth W Nichols**

25 days ago

 2  0

[See all](#)

[See top donations](#)



GiveSendGo, the place where help and hope go hand in hand.

[Start a GiveSendGo](#)





Support GiveSendGo

[Blog](#)

[Jobs](#)

[Press](#)

[Contact Us](#)

[Testimonies](#)

[Prayer Wall](#)

[Pricing and Fees](#)

[Terms of Use](#)

[GSG Tips](#)

[Giver Army](#)

[Help Center](#)

[Privacy Policy](#)

---

© 2022 -- GiveSendGo



## NEWS

# Hand recount in sheriff's race changes six votes, with no effect on outcome

*The recount changed nothing, with Democrat John Gese still winning by nearly 20,000 votes.*



**Andrew Binion**

Kitsap Sun

Published 6:14 p.m. PT Dec. 20, 2022 | Updated 6:15 p.m. PT Dec. 20, 2022

A \$31,000 hand recount of the Kitsap County sheriff's race completed Tuesday resulted in switching six votes, making no change in the race Democrat John Gese won with more than 58% of the vote.

In the recount of 124,242 ballots paid for by a group of supporters of Republican Rick Kuss, Gese added one vote and Kuss scored an additional five votes.

The new results show Gese defeated Kuss 58.13% to 41.87%, or 70,629 votes to 50,880 votes.

William B. Campbell of Bremerton led the group of six voters who requested the recount and paid the \$31,000 deposit in cash.

In a related matter, a spokeswoman for the state's campaign finance regulator, the Public Disclosure Commission, advised the group to register with the commission and report its expenditures and contributions for the recount. The money could also count as contributions to Kuss' campaign, she said.

In a statement provided to the Kitsap Sun on Tuesday, Campbell said the sole purpose of requesting the recount was to ensure that the Hart Intercivic Tabulator used by the Kitsap County Elections Department was accurately tallying votes.

Campbell wrote that he was satisfied that the machines counted ballots accurately, that elections staff was transparent and helpful and that the adjudication process for ballots was valid.

"I greatly respect their knowledge and expertise and am convinced they are conducting our elections as prescribed by the law," Campbell wrote in the statement.

Kuss, who said he was not involved in the recount request except to help the group raise money, said the results showed the machines are not perfect.

"It shows that there are errors in the tabulation machines," Kuss said. "It's not significant enough to change a large race but it's something the company should look further into to keep these things from occurring in the future."

Kuss also said the results gave him some confidence in the outcomes of local elections.

“It supports that on a large scale we can trust the tabulation machines,” he said. “I think that was the ultimate goal of the recount.”

Auditor Paul Andrews, the county's chief elections officer, said that when closely examining ballots there are usually a handful that switch, which is why tight races automatically trigger labor-intensive and costly hand recounts.

The last time the office performed a hand recount was in 2018, for a close legislative race.

Recounting November's sheriff's election, a county-wide election, amounted to the largest recount in Kitsap County history.

“It's where I expected we would be,” Andrews said of the results. “I know the software we use, and the process and procedures, are all good. They are solid. They produce accurate numbers.”

In a prepared statement issued Tuesday evening, Andrews noted the changed votes were due to ballots not being correctly filled out.

"It is important to follow the directions on your ballot when marking boxes and making changes after a box is filled in," he wrote. "With all of the concern people have with voting systems and accuracy, this was a great opportunity to build trust with voters and show that the people who conduct elections and the equipment we use have integrity and are accountable."

In the revised results, Gese added one vote that had been erroneously tallied as an undervote – an election term for leaving the space blank – and Kuss earned five more votes, one from a write-in incorrectly tallied and three from undervotes.

Kuss also scored one additional vote from an overvote, an election term for when more than one candidate is selected. In that case, the machine did not recognize that a voter originally voted for Gese but then canceled that vote but did not follow the instructions for a correction and then voted for Kuss.

In one of the votes that switched from an undervote to a vote for Kuss, Andrews said it appeared the voter started filling out their ballot with a pen that was running out of ink.

By the time the voter arrived at the sheriff's race and filled in the slot for Kuss, the pen's ink had become faint compared with the ink used to vote in other races.

About 35 workers contributed to the recount, working about six and a half days starting Dec. 12, with counters working in teams of two. First workers reconciled the ballots on hand to the machine count then moved on to counting. The actual counting took less than three days.

Andrews said the final cost of the recount has not been tallied, but he expects the tab to be roughly the amount of the \$31,000 deposit.

Kim Bradford, a spokeswoman for the Public Disclosure Commission, wrote that the commission had not encountered this kind of recount before and that paying for recounts is a campaign activity normally funded by candidates or parties and disclosed to the commission.

“If a group other than the candidate or party is pooling funds or soliciting contributions to fund a recount, (commission) staff would advise the group to also register a political committee and file contribution and expenditure reports,” Bradford wrote in an email to the Kitsap Sun. “Additionally, if the recount campaign is coordinated with a candidate, it could qualify a group's expenditures as campaign contributions that need to be reported by the candidate's committee.”

Bradford said she could not comment on whether any laws had been broken, saying that determination is made by the commission and follows a formal complaint. The commission has not received a complaint, she said.

Kuss said it was the group of his supporters' decision on whether to register as a political action committee, or PAC, and disclose their finances to the commission.

“For me this doesn't involve any finances, so I don't have any intent of claiming any of this or registering,” Kuss said.

In an email to the Kitsap Sun, Campbell said he had inquired with the commission and attempted to register the group but asked it for further guidance.

“I will register as a PAC if it is required by law,” Campbell wrote, but noted that he saw the group that had been fundraising through a crowd-sourcing website and the group of voters who requested the recount as distinct groups.

# EXHIBIT 2

January 20, 2022

To: Jennifer Hansen

From: William Campbell

RE: PDC Case Number 115649

PDC Case Number 115649 documents a complaint that alleges violation of RCW 42.17A.205, .235, & .240 when a group of six registered voters requested a manual recount for the November 8, 2022 Kitsap County Sheriff race in accordance with RCW 29A.064.011.

RCW 29A.064.011 required the recount request to be filed within two business days after the county canvassing board certified the election on November 29, 2022.

RCW 29A.64.030 required a deposit of \$31,060.50 in cash or certified check when the recount request was filed.

RCW 29A.64.081 includes a requirement for me, as the applicant, to pay any costs of the recount that exceed the deposit. However, RCW 29A.64.041 gave me the option to stop the recount at any time and the auditor graciously agreed to keep me informed on the accumulating charges during the recount.

After the recount was complete, I generated the following report:

---

## **Observer Report of Kitsap County Sheriff Race Recount**

### **Conducted December 12, 2022 – December 20, 2022**

The results of the Kitsap County Sheriff's Race manual recount were certified by the Canvass Board on December 27, 2022. The recount changed six votes that were originally adjudicated as under votes or over votes and thus were not counted for either candidate. Of the six votes that changed, Rick Kuss gained five votes and John Gese gained one vote. No votes were changed from one candidate to the other.

Instructions on how to vote are printed on each ballot. The voter is instructed to use dark blue or black ink to fill in the block to the left of the preferred choice. The voter is told that if more than one choice for a race is marked then no vote will be counted for that race. To correct a mistake, the voter is instructed to draw a line through the incorrectly marked choice then another choice can be made. These instructions are both written and shown graphically.

The instructions provided with the ballot are the simplest and most easily understood methods of casting and correcting a vote. If the voter marks the ballot differently than directed but the intent can be discerned, then the vote will be counted. The Washington Secretary of State issued a manual for determining voter intent that is used by the Kitsap County Elections Department. (The 2018 version can be viewed at the following link: [https://www.sos.wa.gov/assets/elections/administrators/2018\\_voter-intent\\_web.pdf](https://www.sos.wa.gov/assets/elections/administrators/2018_voter-intent_web.pdf) )

Specific adjudication details of the six changed votes from an observer perspective are provided in the following table.

Precinct	Original Count	Recount	Description	Voter Intent Manual Guidance
58	Undervote	Kuss	Small dot marked in the center of the target area. No other races or markings on that side of the ballot. Races on the other side of the ballot were marked per ballot directions	Rule B, Example 4a Rule B, One Mark on a Ballot
427	Overvote	Kuss	Blocks for both candidates filled in. The block for Gese had a horizontal strikethrough that extended less than 1/8 inch on either side of the block.	Rule C, Examples 4a-b
441	Undervote	Kuss	Write-in for Kuss. None of the blocks filled in.	Rule I Rule M, Example 1b
257	Undervote	Kuss	Scan error? The block filled in for Kuss was a lighter shade than the blocks filled in for other races on the ballot. The auditor retrieved the scanned image that the tabulator used to count the votes and found that the scanned image had no marking in the sheriff race.	Rule A, Example 3b
125	Undervote	Kuss	Tabulator error? Votes were counted multiple times. The auditor reviewed each ballot marked for Kuss and could not detect a discrepancy on any ballot that might cause the scan to miss the vote. The ballot with the vote not counted by the tabulator was consistently marked for all races. The scanned image showed the blocks were filled with tiny spirals that left white dots throughout the scan area. Other votes on the ballot marked in the same manner were counted by the tabulator.	Rule A
455	Undervote	Gese	Scan or Tabulator error? Votes were counted multiple times. Each ballot marked for Gese was reviewed by several senior election department staff members that did not detect a discrepancy on any ballot that might cause the scanner or tabulator to miss the vote. The elections Manager performed a final review and identified the most probable ballot to be tabulated as an undervote. This ballot was confirmed to have been counted as an undervote by the tabulator. I did not observe the marked ballot nor the scanned image that the system counted as an undervote.	Rule A

The chain of custody was observed and no discrepancies identified during the recount.

After the ballots were scanned for the November 8, 2022 general election, the ballots were stored in cardboard containers that are individually sealed with a serialized tag that can only be destructively removed. Either the box or the seal must be cut to open the box of ballots. Prior to sealing the box the seal number is recorded on a form that is then signed by two elections department workers who then insert the signed form inside the box and seal the box shut.

The ballots are always in the custody of at least two elections department workers until they are locked in storage. Access to the sealed boxes in the storage area is through three locked doors/gates. The first access point is a door with badge access by county employees into the shared storage area used by multiple departments. The second access point is a gate into an area defined by chain link fencing from floor to ceiling and secured by a combination padlock. The combination is only known by some of the election department staff. The third access point is a gate into a small chain link storage area that is secured with a keyed padlock. Access to the key is controlled by the elections department. Elections department procedures require two elections department staff members to be present when the inner gate giving access to the stored ballots is unlocked. A security camera and motion detector monitor the two chain link gates.

Our goal during the recount was to observe that the chain of custody of the ballots was unbroken throughout the recount process. An observer was with the two election workers every time ballots were moved in or out of the storage area. We can say with certainty that the ballots were transported between the counting area and the storage area with no detours and thus there was no opportunity for tampering during the transfer.

The ballots were stored by consolidated precincts after the election. The first step for the recount was to sort the ballots by precinct. Completing this step took four days. As the ballots for each precinct were sorted during this process, they would be sealed in the storage boxes as described above and then returned to the secure storage area. At the end of each day some of the sorting was incomplete. The ballots that were still in the sorting process were kept in trays that were loaded on portable racks that were sent with an observer to the secure processing room in the elections department. The room is secured with a badge reader that requires two elections department workers to scan their badges to open the lock. After the racks of in-process ballots were locked in the room a serialized security seal was placed on the door. An observer photographed the seal when it was installed in the evening and again just before the seal was broken in the morning. All the photographs matched indicating the room remained sealed throughout the night, every night.

The ballots were all sorted by precinct at the end of the fourth day of the recount.

The morning of the fifth day the count of the votes cast in the sheriff race began. The consolidated precinct order of the recount was determined by random drawing to be CP9, CP5, CP1, CP4, CP2, CP7, CP6, CP8, and finally CP3. The order of the precincts counted within the consolidated precinct was also random, but was not in any specified order.

Multiple teams of two workers were assigned to count the votes. There are two fundamental steps to accomplish the manual count of the votes cast in each precinct. First the ballots were separated into three groups, one with votes for Rick Kuss, one with votes for John Gese, and one for any other type of vote (undervote, overvote, and write-in). Next each stack of ballots was counted individually by each of the two people on the counting team.

Each counter recorded the number of ballots in each of the ballot stacks on a temporary tally sheet without disclosing their count to their teammate. When both counters were finished the tally sheets were given to an Election Department staff member who compared the tally sheets. If the tally sheets did not match the team repeated the counting process. If the tally sheets did not match the second time the ballots for that precinct were given to a different counting team and the process was repeated.

When a team of counters had matching tally sheets the sheets were delivered to the Elections Supervisor. The tally was then compared with the original count from the general election. If the original count and the manual recount matched then the tally sheets were returned to the counting team along with a certification sheet. The workers transcribed their tally to the certification sheet and both certified by signature on the sheet that the tally was true and correct. This document is the official election result for that precinct.

If the Election Supervisor received temporary tally sheets where the general election count and the manual count differed, then the counting process was repeated to double check the accuracy of the manual recount. This process resulted in identifying and scrutinizing the six votes that were changed by the manual recount.

The manual recount process affirmed the adjudication process of the Kitsap County Elections Department used in the general election. To accomplish a hand recount every single ballot is manually adjudicated. Three of the votes that changed can be attributed to adjudication errors (Precincts 58, 427, & 441). Each of these changes involved discussions and review of the Voter Intent Manual to make the final determination during the manual recount and, as an observer, I have confidence that these votes will be examples in future adjudication training done by the Elections Department.

One posited theory of a way to commit election fraud is that the tabulator has an adjudication feature to allow groups of votes to be adjudicated with a single keystroke. There was no evidence of wholesale adjudication of votes during the general election. Other than the three exceptions discussed above, any scanned image adjudicated during the general election was adjudicated the same way when two people looked at the paper ballot during the hand count.

So, what did the manual recount accomplish? I personally have a few responses to that question and I am sure others do as well. When I worked as an engineering supervisor and a complicated system would malfunction there would sometimes be days when we checked for specific problems and would not be able to find anything wrong. Each day I would encourage my engineers, telling them that we were making good progress because knowing where the problem is not tells us a little bit more about where the problem is.

Our government is a constitutional republic that was handed down to us. I believe our election system is a figurative wall that is an element of our protection from tyranny. I am guilty of many years of complacency and, until now, have not personally done anything to be sure our election system is not deteriorating or even worse, crumbling.

In the Old Testament the Bible tells of a time when the nation of Israel suffered a military defeat. The people of the nation were taken captive and forcefully sent to a land far from their homes. After many years the people were allowed to return to their homeland, but their homes had been unoccupied and had fallen into disrepair. The walls around the city had crumbled leaving large gaps in many places so the people were vulnerable to hostile groups living in the surrounding area. To restore their defensive perimeter, every person was assigned the task of rebuilding the section of wall where they lived.

This account from the Bible teaches me that it is my job to check, maintain and, when necessary, be actively involved in repairing damage to any of the infrastructure that provides protection for me, my family, and my community.



The hand recount of the Kitsap County Sheriff Race was requested to get new information on the single issue of whether or not the Hart-Intercivic Tabulator used by the Kitsap County Elections Department is accurately tallying the votes that are cast.

I believe the recount request was unexpected by everyone. No political parties were involved in the request nor were they involved in the recount. Sheriff Gese won this contest with 58% of the votes so there was no political drama involved while conducting the recount. The race being recounted affects no one outside of Kitsap County and the outcome is tallied by a single elections department and tabulator system.

The recount gave us an opportunity to see the chain of custody remain unbroken. The ballots are sealed in boxes after tabulation during the election and stored behind three locks while monitored by a security camera and a motion detector. We were allowed and encouraged to observe the ballots being removed from storage and then to verify that there had been no tampering with the sealed boxes.

With only six votes changed out of 124242 ballots cast, my assessment is that the election results produced by the Hart-Intercivic tabulator of the Kitsap County Sheriff race are accurate. Of those six votes that were changed, three were not processed correctly by the scanner/tabulator system. Our Kitsap County Elections Department Staff is incorporating these ballots into election worker training as examples that require further review before being processed by the scanner/tabulator system. The Auditor and Elections Department management are also attending a statewide conference where these specific examples will be shared with the tabulator vendor and other elections departments.

The Kitsap County Auditor, the Elections Department Manager, the Elections Department Supervisor, and the Elections Department Staff were remarkably open and transparent throughout the recount process. I greatly respect their knowledge and expertise and am convinced they are conducting our elections as prescribed by the law.

/s/ William Campbell

Chairman

Group of six registered voters requesting recount in accordance with RCW 29A.64.011.

---

It's hard to say when my interest and commitment to conducting this recount began but probably goes back to a lot of little things over many decades. The trigger for me to do this recount was that at some point after the election I learned that the Elections Department had conducted a random batch audit that was available to watch on the Kitsap County Auditor's website and on YouTube (<https://www.youtube.com/watch?v=2fm8XIYQSLQ&t=1379s>).

To conduct this audit, a random sample of ballot batches ready for processing was scanned and a report for the Kitsap County Sheriff contest was produced by the tabulator. The following day a hand count of these 413 ballots was performed and the result was 43% for John Gese and 55% for Rick Kuss. The audit was declared a success because the machine count matched the hand count. However, the statistical probability of a random sample of actual votes cast varying so dramatically from the election result of 59% for John Gese and 41% for Rick Kuss seemed unlikely to me and so my skepticism of the election process was elevated.

My introduction to the possibility of conducting the hand recount of the Kitsap County Sheriff race was via a social media post with a link to a GiveSendGo fundraising effort for the recount (<https://www.givesendgo.com/RecountKitsap>) that I saw a day or two before Thanksgiving. The fundraiser description was fairly short at that time and stated that the end goal was not to overturn the election results, merely to trust but verify them.

I provided my contact information to the person that had posted the link and expressed my desire to provide a donation to the recount effort without using a credit card so that the full amount of the donation would be used to fund the recount.

The following Monday I was invited to a small gathering to discuss the possibility of requesting a recount for the Kitsap County Sheriff race where I was shown RCW 29A.064.011 and I agreed to be chairman of our group of six registered voters. With the Canvas Board scheduled to certify the election the next day we recognized that the required deposit could only be made using funds that were easily accessible to members of our group. I committed to a donation for about 10% of the deposit and agreed to provide an additional 60% hoping that it would be returned to me at some time in the future. The group agreed to produce the remaining 30% of the deposit. As a group we were aware of the GiveSendGo fundraising account and the possibility of using it to reimburse a portion of the deposit provided by members of our group. As chairman, I committed to preparing the written request for the recount and we adjourned.

Our group of six registered voters met again on the evening of November 30, 2022 to review the written recount request and to pool our cash for the accompanying deposit. At some point I became aware that about 30% of the deposit was funded from credit card loans and, out of personal conviction, returned that money and replaced it with my own funds.

On the morning of December 1, 2022 the written request for a hand recount of the Kitsap County Sheriff race was delivered to the Kitsap County Auditor along with the cash deposit. To the best of my knowledge, the group honored my request to take this action without notifying any media or political party.

The written request for the hand count is provided below:

---

## **Written Request for Hand Count of Kitsap County Sheriff Race**

**30 November 2022**

To Whom it May Concern,

In accordance with RCW 39A.64.011, the undersigned registered voters in Kitsap County hereby apply for a manual recount of all votes cast in the 2022 General Election for Kitsap County Sheriff. The data we are seeking is only for the gross total, so we are requesting the recount for all precincts

The group has designated William Campbell as chair of the group.

The recount requested is similar to the random batch audit. Our request is to hand count the 124242 ballots to verify the certified results of the election. We understand the total cost will include handling the sealed containers with the ballots while maintaining chain of custody requirements. We have observed the random batch audit and note that two people counted and double checked approximately 400 ballots in 30 minutes.

We also understand that there will be some cost associated with setting up a room with sufficient space for the counting team and observers.

We also understand that there will be some cost associated with sealing each container after the count of that container has been completed.

We acknowledge receipt of an e-mail from Auditor Paul Andrews dated 30 November 2022 explaining that an amended abstract is required to be presented to the canvassing board after the count. We understand that this requirement necessitates sorting the ballots by precinct and that the costs associated with sorting the ballots is part of the requested recount.

The elections department of the Kitsap County Auditors Office is requested to perform the recount in a space large enough for observers and permission for representatives of both candidates to observe the count.

/s/

William B Campbell

REDACTED

/s/

REDACTED

/s/

REDACTED

/s/

REDACTED

/s/

REDACTED

/s/

REDACTED

---

On December 5, 2022 someone recommended that I check in with the Public Disclosure Commission (PDC). My call was routed to a Filer Assistance Specialist who cheerfully advised me to register as a political committee and complete all the actions associated with filing as a political committee. The phone conversation was followed by an e-mail summarizing the information provided in our conversation with links to the appropriate web pages.

My first step in the process to register as a political committee was to review the PDC Political Committee FAQ page (<https://www.pdc.wa.gov/registration-reporting/candidates-committees/political-committee-faq>) to be sure that I understood the requirements.

The first FAQ on that web page is; "Which committees file disclosure reports?" The answer states that committees that raise and spend money to influence elections must register and report. My thought was that any money our group would raise or spend could not influence the election because it was certified. No more ballots could be cast in the election. In my opinion the posted PDC response to that question is quite clear that our group was not required to file a political committee report.

The second FAQ on the web page is; "What starts the whole process?" The answer states we would become a political committee when we first expected to receive contributions or spend money in support of or opposition to any candidate. Similar to the first question, we were planning to spend money to pay the county elections department to count the votes that had already been cast in a certified election. Counting the votes that have already been cast is a neutral activity that is neither in support of nor opposition to either candidate.

The third FAQ on the web page is; "When does a committee register?" The answer provides two options that depend on how long **before** the election the political committee is organized. If it's more than three weeks before the election then the filing deadline is two weeks after the organization becomes a committee. If it is less than three weeks before the election then the filing deadline is three business days after the organization becomes a committee. Our group of six registered voters was formed more than three weeks **after** the election. Neither of these published deadlines are applicable to our group.

All these answers in plain English to me mean our group does not meet the definition of a political committee and therefore none of the filing requirements apply. However, I understand that whatever is written in the law as interpreted by the courts supersedes any plain English translation. That evening I responded to the Filer Assistance Specialist with a condensed version of the three FAQs above and asked that the advice to have our group register as a political committee be re-evaluated.

Seven business days later (December 14, 2022) when the recount was nearly half completed the Filer Assistance Specialist responded that funding recounts is a campaign activity normally funded by candidates or political parties and is disclosed through reports to the PDC. If a group other than the candidate or party is funding the recount, it would need to register a political committee and report the activity.

I then requested that the portion of the law used to make that determination be provided. The response, that I did not see until the following day after the recount was complete, was based on RCW 42.17A.005(41) which states: "Political committee" means any person (except a candidate or an individual

dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures **in support of**, or opposition to, **any candidate** or any ballot proposition."

In my mind, this RCW excerpt repeats the information that was provided on the FAQ web page and circles back to my original point that by definition, a group formed after an election for the sole purpose of counting the votes that were certified to have been cast in that election, and is raising funds for the sole purpose of paying the neutral county election department to perform the recount can be neither in support of, nor opposed to anything on the ballot.

I can understand how historical examples of funding recounts have been considered a normal campaign activity that gets reported because the organization providing the funds would normally have been formed prior to the election for the purpose of supporting or opposing something on the ballot. Then all the conditions to file as a political committee clearly apply. I do not understand the logic assertion that because recounts are normally funded by campaigns or political committees then any organization requesting a recount, regardless of when or for what purpose it was formed, must register as a political committee.

I responded to the Filer Assistance Specialist, attempting to articulate that we had not yet come to a mutual understanding concerning the formation of the group of six registered voters that requested the recount and that I did not yet understand the logic or how the provided RCW excerpts clearly required me to register our group as a political committee.

The next communication I received from the PDC was the notification that a complaint had been received on December 26, 2022 and stated that the complaint alleges the following:

- **Allegation One: Alleged violation of RCW 42.17A.205 for failure to register as a PAC**
- **Allegation Two: Alleged violation of RCW 42.17A.235 & .240 for failure to disclose contribution and expenditure information on C3 and C4 reports**

When I read the complaint prepared by the Complainant, it seemed to be focused more on PDC staff processes than on anything I had failed to do. However, I did eventually notice that in the section of the complaint form for listing attached evidence, the Complainant states that according to the article from the Kitsap Sun attached to the complaint, the "respondent did not register committee." Based on that entry I understand how Allegation One is based on the complaint filed.

I understand how Allegation Two follows from Allegation One in that if a group is not registered as a political committee then there is no mechanism to file financial reports for the group. It is helpful for me to know that if I am in error for not registering as a political committee, then when I do register I will need to file financial reports. However, until Allegation One is resolved it seems that Allegation Two is premature.

Concerning Allegation One. As chairman of the group of six registered voters that requested a recount of the Kitsap County Sheriff Race in the November 8, 2022 General Election in accordance with RCW 29A.64.011, I acknowledge that the group is not registered as a political committee and do not believe the group fits the “political committee” definition of RCW 42.17A.005(41) because we had no expectation of receiving contributions or making expenditures either supporting or opposing any candidate on the ballot as discussed above. Therefore, RCW 42.17A.205 requirements to register as a political committee should not apply to our group.

Concerning Allegation Two. As chairman of the group of six registered voters that requested a recount of the Kitsap County Sheriff Race in the November 8, 2022 General Election in accordance with RCW 29A.64.011, I acknowledge that the group did not disclose contribution and expenditure information on C3 and C4 reports because we did not register as a political committee because I do not believe the group fits the “political committee” definition of RCW 42.17A.005(41) because we had no expectation of making expenditures either supporting or opposing any candidate on the ballot as discussed above. Therefore, RCW 42.17A.235 & .240 requirements to disclose contribution and expenditure information on C3 and C4 reports should not apply to our group.

Respectfully,

/s/

William B Campbell

Chairman

Group of six registered voters requesting recount in accordance with RCW 29A.64.011.

# EXHIBIT 3



711 Capitol Way Suite 206  
PO Box 40908 Olympia, WA 98504-0908  
(360) 753-1111  
Toll Free 1-800-601-2828

## CASH RECEIPTS MONETARY CONTRIBUTIONS

# C3

Richard S. Kuss (Rick Kuss)  
Committee to Elect Rick Kuss for Sheriff -  
P.O. Box 278  
Seabeck, WA 98380  
COUNTY SHERIFF  
KITSAP CO

Deposit date: 09/19/2022  
Report number: 110113527  
Submitted date: 09/19/2022

### 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date received		Amount	Total
09/18/2022	a. Anonymous	\$50.00	\$50.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	\$0.00	\$0.00
	c. Loans, notes, security agreements (Schedule L)	\$0.00	
09/18/2022	d. Miscellaneous receipts (interest, refunds, auctions, other)	\$0.00	
09/18/2022	e. Small contributions 2 persons giving	\$25.00	

### 2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$2,307.00

Corresponds to amount on line 1, Schedule A to C4, and itemized below

### 3. ITEMIZED CONTRIBUTIONS

Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
09/18/2022	HENDEN=KLINGBEIL FAYE H 25742 Pyramid Ln NW , Poulsbo, WA 98370	Occupation: RETIRED	\$100.00	General \$260.00
09/18/2022	WILSON MARC PO Box 294 , Manchester, WA 98353	Occupation: Retired	\$20.00	General \$20.00
09/18/2022	SCHUESSLER ROSEMARY 13956 Canvasback Ct NW , Bremerton, WA 98312	Self-Employed Bremerton WA Occupation: Computer Programmer	\$100.00	General \$100.00
09/18/2022	EDWARDS KEN 3370 Arvick Rd SE , Port Orchard, WA 98366	Occupation: RETIRED	\$20.00	General \$20.00
09/18/2022	REGUSCI BECKIE 276 NW Paulson Rd , Poulsbo, WA 98370	Occupation: RETIRED	\$200.00	General \$200.00
09/18/2022	BEIL KARLYN 2916 NW Bucklin Hill Rd , Silverdale, WA 98383		\$50.00	General \$50.00
09/18/2022	CAMPBELL WILLIAM 5629 Minard Rd W. , Bremerton, WA 98312	Occupation: RETIRED	\$552.00	General \$552.00
09/18/2022	ALEXANDER LANE		\$100.00	General \$100.00



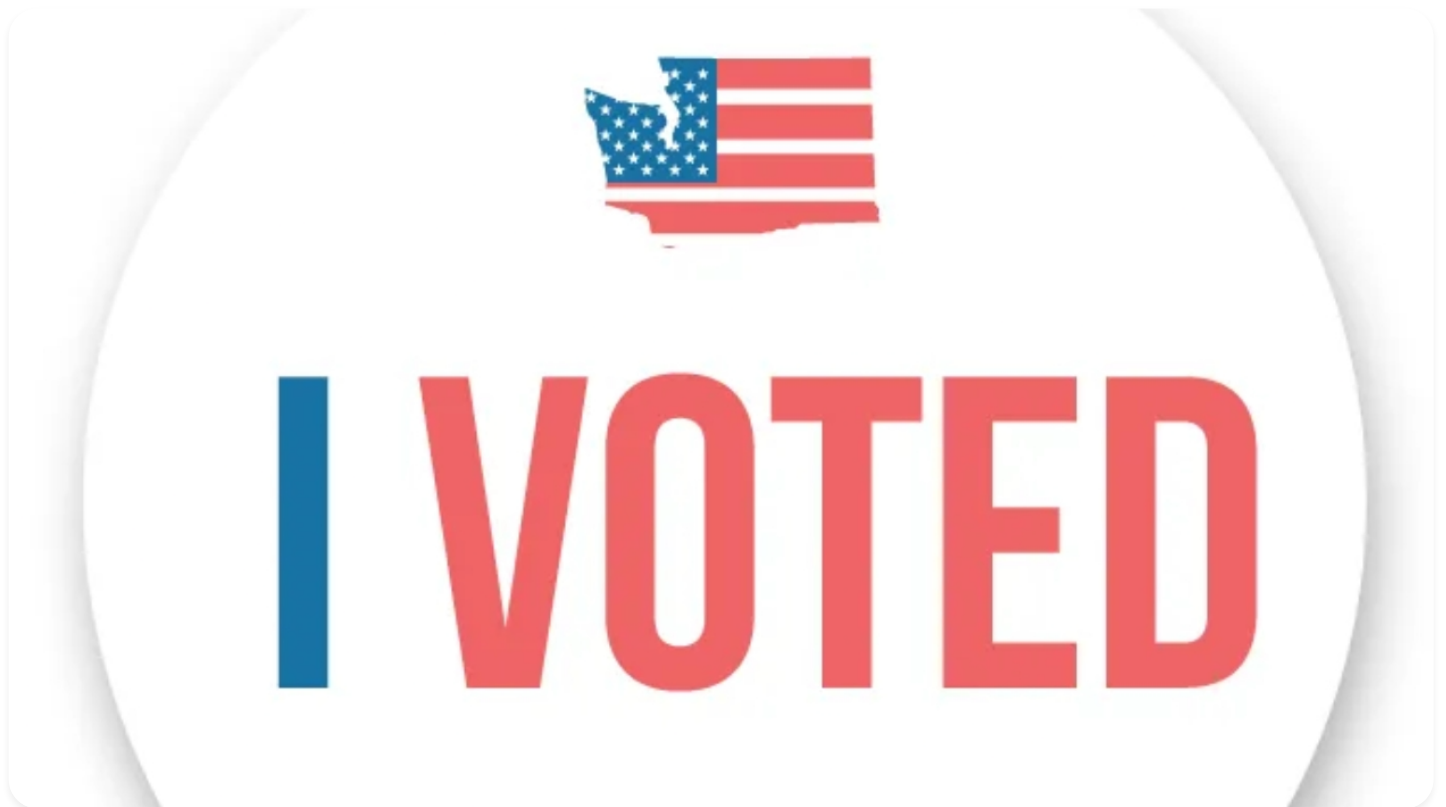
Date received	Contributor (Name and address)	Employer and address	Amount	Aggregate total
	840 NE Melanie Ct , Bremerotn, WA 98311			
09/18/2022	EXUM IAN 524 Flower Meadows St , Port Orchard, WA 98366		\$40.00	General \$40.00
09/18/2022	PETERSON NATHAN 7030 Stourbridge Pl NE , Bremerton, WA 98311		\$50.00	General \$50.00
09/18/2022	PUGET SOUND PATRIOTS PO Box 141 , Silverdale, WA 98383		\$1,000.00	General \$1,000.00

Date of deposit  
09/19/2022

**I certify this report is true and complete to the best of my knowledge**  
Treasurer's signature and date  
Richard Kuss - 09/19/2022

# EXHIBIT 4

## Supporting Hand Recount for Election Integrity



Campaign Created by: **Friends of Rick Kuss**

Goal: **USD \$47,000**

Raised: **USD \$ 0**

The Bible teaches me that as a follower of my Lord and savior Jesus Christ, I am only a steward of the funds that God has entrusted to my care. This morning during my prayer time I was reminded that I am to trust Him in all things. I had freely given money to the group as a contribution and I willingly loaned additional money to the group effort. This morning the Lord gently reminded me that all I have is His and my desire to have some of His money returned to me through crowd source funding is, for me, a sin.

[Need Help?](#)

I appreciate the generous monetary contributions that have been made to this account but want you to know that I will not be requesting the use of any of these funds as reimbursement for any of the payment for the recount made in accordance with RCW 29A.64.011.

I do not know God's purpose for this recount. It may simply be the Lord publicly teaching me a lesson in humility and stewardship. I am certain that God's purpose is not to weigh in on an election result but rather, in some way, to bring people to the knowledge and faith Jesus came to earth, died on the cross, and was raised from the dead to restore the relationship He desires with every single one of us.

I covet your prayers as we go through this recount process. Please pray for John and Rick. They bear the image of God and He loves them both dearly. Please pray for the staff of the elections department as they have been asked to give their time and energy to the recount during this Christmas season when we celebrate the birth of our savior, Jesus Christ.

William Campbell  
December 7, 2022

#### 12/10/2022 Update on Fundraiser:

We received the above communication from William Campbell earlier this week and responded that while we appreciate his desire to shift our focus from fundraising to prayer, the fundraiser provides a way for the community to show their support in a tangible way.

After several discussions he has agreed to accept repayment of the money he provided as a loan but will then consult with us to redirect the funds to individuals, organizations, or efforts engaged in discovering and resolving flaws or weaknesses in our election systems and processes. He stressed that none of the funds returned to him will be given to any political party or campaign.

#### 12/5/2022 Update on Fundraiser:

The election was certified November 29, 2022. The Recount request was filed on December 1, 2022 in accordance with RCW 29A.64.011.

We have spoken with the Auditor's office, and they tell us that we will have to put a security deposit down to get the process started. RCW 29A.64.030 requires a deposit of 25 cents for each ballot that is requested to be manually recounted, and there are 124,242 ballots in Kitsap. Then the Auditor's office has to setup a space (likely the Commissioner's chambers) to count the ballots. They said they need to do this to accommodate so many paid workers since the room they normally use to process ballots is too small. The number of paid workers they will use is unknown at this time, but they said likely close to 30. After setup of the ballots then they begin counting.

Once they are complete with the process and have our total then we will see if we owe them any more funds. RCW 29A.64.081 directs the canvassing board to determine the expenses for conducting a recount. If the costs of the recount exceed the deposit the applicant shall pay the difference. To meet the filing requirements the applicants for the recount have accepted the personal financial risk associated with the deposit and with the total cost of the recount being unknown.

We estimate that if they have 30 employees being paid \$30/hour (hourly wage + benefits) working 8-hour shifts then that is roughly \$7,200 per day for the counting portion (30 people x 8 hour shifts x \$30 per hour). This does not include setup and breakdown.

The Auditor's Office continues to be transparent and has provided a good faith estimate of \$34,000 to perform the hand recount. The Office noted that a recount like the one we have requested has never been performed so there is some uncertainty in the accuracy of the estimate. Based on the explanation of the process used to arrive at the estimate we believe it is the minimum cost we can hope for. Allowing for the estimate to be exceeded by 40% and accounting for contributions that were used to make the deposit required by law when the recount request was submitted, we have revised our goal down to \$47,000.

RCW 29A.64.041 (2) allows us stop the count upon written request at any time. The deposit of \$31,060.50 was made by individual registered voters of Kitsap County using their own contributions and unsecured loans. The Auditor's Office is planning to provide us with updates of the total cost as the recount progresses. This will give the registered voters that requested the recount a financial escape path if all available funds are consumed before the recount is complete.

If we do have money left over we will save this money to be used for future hand recounts in other counties if needed. We want to ensure that we have clear evidence of trust in the voting system that we have in WA state and that will only be achieved through verification. No matter what side you are on, this should make sense.

We are asking WA state citizens to pledge to help keep election integrity in our state by donating for a hand recount of the Sheriff's race in Kitsap County. The HART intercivic machines that are used in Kitsap County are used in 16 counties in WA state so this look at these machines is a way to evaluate this system in 16 other counties in WA state.

How does the HART intercivic system work? It does not count paper ballots. Instead, ballots are scanned, and ballot images are saved. Then the images are read by the election system and tabulated. If the software is unable to read the ballot selections, the image/record is manipulated through adjudication, and then tabulated. Each step in the process, in terms of this description, is deemed an "event". Events are logged for each process within the system in real time. These logs are the record of events that take place within the system while processing and counting the votes. At 8 pm on election night, the voting machine tabulates all the votes to come up with the winners.

The end goal is not to overturn the election results, merely to trust but verify them. Your vote is more important than your money and you should have the same trust in your voting system as you do in your bank. We need to verify our voting system just like we would if we cashed a check at a bank. Do you count your money when you cash a check? Yes. Why? Because you trust the bank but you also verify that it is accurate. We want the same standard for our elections. Trust but verify.


We as registered voters of Kitsap County, want to gain confidence in the tabulation machines just as we do in a hand recount. Several people have stated that they are not voting based on a perceived lack of trust. We are uniting to verify the results and instill confidence in our election process.

We want to look closely at whether the results of the machine will match 100% with the hand count. If it doesn't, it will mean your vote does not matter and this voting system needs to be put into question. How can you trust the system when your vote is not counted correctly?

We must ensure our vote matters and be able to trust the system that codifies our voices. This begins with one donation. Are you willing to donate for a full hand recount and ensure election integrity?

Thank you for your time and consideration.


**Read less**



**UPDATES**

*Follow this campaign to get email notifications when the campaign owner posts an update.*

FOLLOW



**PRAYER REQUESTS**

Click the Pray button to let the campaign owner know you are praying for them.

PRAY



GiveSendGo, the place where help and hope go hand in hand.

[Start a GiveSendGo](#)



Support GiveSendGo

<a href="#">Blog</a>	<a href="#">Jobs</a>	<a href="#">Press</a>	<a href="#">Contact Us</a>
<a href="#">Testimonies</a>	<a href="#">Prayer Wall</a>	<a href="#">Pricing and Fees</a>	<a href="#">Terms of Use</a>
<a href="#">GiveSendGo Tips</a>	<a href="#">Giver Army</a>	<a href="#">Help Center</a>	<a href="#">Privacy Policy</a>

© 2023 -- GiveSendGo

# EXHIBIT 5



## Washington Public Disclosure Commission

#114625

## Ticket Details

<b>Status</b> Closed	<b>Priority</b> Low	<b>Source</b> Portal	<b>Type</b> Get help or information
<b>Group</b> Filer Assistance	<b>Agent</b> Scott Haley	<b>Requester name (Or Respondent)</b> William Campbell	<b>Requires redaction</b> false
<b>Which committee is this request for?</b>	<b>Whose reports do you want?</b>	<b>When?</b>	<b>Report</b>
<b>Are you a Lobbyist, Candidate, etc.</b>	<b>Which system?</b>	<b>Filing method</b>	<b>Exemption request</b>
<b>Unfounded or Frivolous</b> false	<b>Public Acknowledgment</b> false	<b>Legal name</b>	<b>Telephone number</b>
		<b>U.S. mail address</b>	<b>Respondent name (the person's against whom the complaint is filed)</b>
<b>Sections of law violated</b>	<b>In the description below I have described What impact does the alleged violation(s) the allegations and attached any availablehave on the public? evidence to support my complaint.</b> false		<b>List of attached evidence or contact information where evidence may be found</b>  <b>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.</b> false
<b>Date complaint perfected with oath requirement</b>	<b>Complainant</b>	<b>Analysis and Chronology of Review</b>	<b>Political Category</b>
	<b>Status of Investigations</b>	<b>Initial Hearing Date</b>	<b>Estimated Date of Completion</b>
<b>90-Day Due Date</b>	<b>Remedial allegations</b>	<b>Technical corrections</b>	<b>10 Day Notice</b> false
<b>10 Day Acknowledgment</b> false	<b>Group Enforcement</b>	<b>Publish to web</b>	<b>Response Posted To Web</b>
	<b>Results Posted To Web</b>	<b>45 Day Notice</b> false	<b>Case Disposition Notice</b> false
<b>Complaint</b>	<b>Case</b>	<b>Complaint/Case</b>	<b>Complaints submitted to the Public Disclosure Commission (PDC) are public records under Washington's Public Records Act (RCW 42.56). If the complaint provides sufficient information</b>

<b>about an alleged violation that is within the PDC's legal authority, it w</b> false	<b>Created by API - Ignore</b> <b>Presentation topic</b>	<b>Unfounded or Frivolous</b> <b>Who will be in the audience?</b>	<b>Telephone number</b> <b>Is the meeting an open public meeting forum?</b>
<b>Approximate audience size</b>	<b>Preferred date(s) for presentation</b>	<b>Presentation format</b>	<b>What else can you tell us about your topic choice and the reason you are requesting it?</b>

---

by **Cbcampbell56** on **Mon, 5 Dec, 2022 at 2:40 PM** via **Portal**

#### Get help or information - William Campbell

I am the designated chairman of a group of six registered voters that filed for a recount of the Kitsap County Sheriff election in accordance with RCW 29A.64.011. I am not part of a political party or campaign, however am biased in favor of Mr. Kuss who was the Republican candidate for that office.

The other five registered voters share my bias. We have not discussed, and I do not know, how involved any of them were or are involved with a political party or candidate.

We self funded the deposit that was required when the recount request was submitted. We pooled the money and signed the recount request on the evening of November 30, 2022.

I am pretty sure that there is a requirement to file a report but I don't know where to begin. Please provide me with the starting point in the required process.

Note: My initial contact was via phone call. After multiple transfers I ended up with the voice mail of Scott Haley where I left a similar message.

---

#### Comments

by **Scott Haley** on **Mon, 5 Dec, 2022 at 4:22 PM** as **Private note**

I returned William Brian Campbell's phone call on Monday afternoon 12/5. From previous discussions we've had at the PDC about recounts, I understand that people pooling funds and soliciting contributions for a recount should register as a PAC, so I advised him to do that, and we discussed what's involved. From the amounts of money involved, this will be a full reporting committee. He'll contact me when he has questions or needs assistance.

--Scott

---

by **Scott Haley** on **Mon, 5 Dec, 2022 at 4:43 PM** as **Outbound email**

William Campbell,

If you'd like to send me questions by email, one way would be to send a reply to this message--it'll go right to me.

The [C1pc political committee registration form is here \(https://apollo.pdc.wa.gov/campaigns/committees\)](https://apollo.pdc.wa.gov/campaigns/committees). The [ORCA filing software for filing financial reports after you register is here \(https://www.pdc.wa.gov/registration-reporting/candidates-committees/electronic-reporting-tools/online-reporting-campaign-activity-orca\)](https://www.pdc.wa.gov/registration-reporting/candidates-committees/electronic-reporting-tools/online-reporting-campaign-activity-orca). That page also has links to instructions on installing and using ORCA.

As we discussed, you need to report the name and address of donors who give or loan more than \$25 to your committee, and for individuals persons, report the occupation, employer, and employer's city and state of individuals who give or loan more than \$100 to the committee. The [political committee reporting guide is here \(https://www.pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics\)](https://www.pdc.wa.gov/registration-reporting/candidates-committees/registration-reporting-basics).

[The rules about contributions from foreign nationals are here \(https://www.pdc.wa.gov/news/2020/law-prohibited-foreign-involvement-and-financing-campaigns\)](https://www.pdc.wa.gov/news/2020/law-prohibited-foreign-involvement-and-financing-campaigns). Our web page has an [example of what information should be on the certification form \(https://www.pdc.wa.gov/sites/default/files/2022-04/Sample%20Certification.pdf\)](https://www.pdc.wa.gov/sites/default/files/2022-04/Sample%20Certification.pdf). Again, you don't have to be concerned with this if it's a contribution from an individual person. While you shouldn't take a contribution from a person that you know to be neither a U.S. citizen nor a person here with a "green card," you are not required to check the immigration status of individual people who donate to your committee.

Please keep campaign books of account for your committee. This is a financial ledger with receipts, copies of checks, that kind of thing. Keep the certifications with it if you get them. Another thing that you should keep with the books of account is loan agreements for the loans your committee gets. [Instructions and an example of a loan agreement are here \(https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/campaign-loans-loan-agreements\)](https://www.pdc.wa.gov/rules-enforcement/guidelines-restrictions/campaign-loans-loan-agreements).

My phone number is (360) 586-8637.

Thank you,

--Scott Haley  
Filer Assistance Specialist

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov> (<http://www.pdc.wa.gov>)  
1.360.753.1111

---

by **Cbcampbell56** on **Mon, 5 Dec, 2022 at 10:57 PM** as **Incoming email**

External Email

Hello Scott,  
Thank you for spending so much time on the phone and then putting this e-mail with the links together.

I don't want to be difficult but I'm struggling to understand how our group is a political committee that falls under the reporting requirements based on the Political Committee FAQ section of the web page.

- We are not raising or spending money to influence any election. The group was formed after the election was certified so it is not possible for anything we do to influence the election. According to RCW 29A.64.011 we are defined as a group of registered voters that filed an application for a recount.
- None of our expenditures will be in support of or in opposition to any candidate or ballot proposition. All our expenditures are to pay expenses for conducting a recount of votes.
- The deadlines for filing the registration only seem to apply to committees that are formed before an election. This group was formed more than three weeks after the election

Will you please re-evaluate whether or not the definition of a political committee applies to our group?

I really appreciate your help.

Thank You,

William Campbell

---

by **Scott Haley** on **Tue, 6 Dec, 2022 at 4:47 PM** as **Private note**

Hi Kurt,

Per RCW 29A.64.011 (<http://app.leg.wa.gov/RCW/default.aspx?cite=29A.64.011>), a group of five voters may request a recount. I was contacted by someone from such a group. They will pay for a recount and solicit contributions to compensate the people who paid for it. Based on our conversation on [ticket #114493 \(https://wapdc.freshdesk.com/a/tickets/114493\)](https://wapdc.freshdesk.com/a/tickets/114493) and the other recent conversations we've had about recounts, I advised him to have the group register as a political committee, and since they'd be raising and spending more than \$5,000 that should be full reporting. He came back and asked why he needs to register as a PAC, if all they're doing is requesting and paying for a recount. Did I advise him correctly that they need to register as a PAC to do this?

Thanks,

--Scott

(<http://app.leg.wa.gov/RCW/default.aspx?cite=29A.64.011>)

---

by **Kurt Young** on **Tue, 6 Dec, 2022 at 5:16 PM** as **Private note**

Scott,

So I looked at the election results for this race and I copied the results for this race into the email below. Mr. Campbell indicated that the group initiating the recount is in favor of Rick Kuss.

While I understand the point Mr. Campbell is making about the activity not supporting or opposing a candidate, since the election has been held and his group has made contributions to support a recount of the election results, your advice seems to be consistent with the prior discussions we have had concerning this topic. The other recount issues involved a candidate or political party organization so those activities would be disclosed since those filers are already registered and reporting, so we were mainly discussing how to report (exempt vs. non-exempt) and do contribution limits apply.

Here we would be advising the group to register as a political committee after the election had already been held, and I think we need more feedback from management....and Phil before we formally advise them to register.

Kurt

### Kitsap County Sheriff

Candidate	Total Votes	% Votes
John Gese (D)*	68,079	58.5%
Rick Kuss (R)	48,196	41.4%
Write-In	126	0.1%

by **Phil Stutzman** on **Wed, 7 Dec, 2022 at 12:08 PM** as **Private note**

I think this is a question that needs more discussion. There are good arguments for the group being considered a political committee and for not being considered a political committee. For example:

**For Being a Political Committee:** Even though the period for voting is over, the group has stated its preference for one of the candidates, and its stated purpose in raising money to reimburse the individuals paying for the recount is to obtain a different election result in favor of their preferred candidate. In that sense, the group could be considered a Political Committee under RCW 42.17A.005(41) which states: "Political committee" means any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures **in support of**, or opposition to, **any candidate** or any ballot proposition. The group is paying for a recount **in support of** their preferred candidate.

**For Not Being a Political Committee:** The voting is over and additional voting is not allowed. The group is a "person" under RCW 42.17A/005(39) which states: "Person" includes an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized. However, the group is not raising and spending money to influence voters, but is simply paying to have election officials "recount" the results to ensure the result is accurate. In that sense, it could be concluded the group is not a political committee.

Asking an existing political committee, such as a party committee, to report its contributions received and expenditures made to pay for a recount is different in that an existing political committee must report **all** of its contributions and expenditures regardless of the purpose.

by **Cbcampbell56** on **Wed, 7 Dec, 2022 at 2:34 PM** as **Incoming email**

External Email

Hi Scott,

I'm just checking in to see if you are considering my question of whether or not the group of registered voters that requested a recount of an election fall under the definition of a political committee. I understand that most people who asking need to go through

the normal process. I'm not a lawyer, but I don't see how the group fits the definition of a political committee. I've been scanning the RCW trying to find some other definition that fits our circumstances but haven't yet found anything.

Please let me know if you are taking or will take any action to respond to my comments and questions.

Thank You,  
William Campbell

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

---

by **Scott Haley** on **Wed, 7 Dec, 2022 at 3:12 PM** as **Outbound email**

William Campbell,

I'm in conference with more senior staff at my agency about whether a group soliciting contributions towards paying for a recount is required to register with the Public Disclosure Commission as a political committee. I will send you a message about this soon.

Thank you,

--Scott Haley  
Filer Assistance Specialist

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov> (<http://www.pdc.wa.gov>)  
1.360.753.1111

---

by **Cbcampbell56** on **Wed, 7 Dec, 2022 at 10:03 PM** as **Incoming email**

External Email

Thank you for letting me know that discussions are in progress. I just wanted to be sure my inquiry hadn't slipped through the cracks. I appreciate your help in figuring this out.

---

by **Kendra Hodgson** on **Tue, 13 Dec, 2022 at 2:36 PM** as **Private note**

Adding a note to this ticket connected to the conversation had during Compliance meeting today 12/13/2022.

Follow up related to reporter question and outstanding questions found in the thread here.

12/13 - Tanya spoke w/Stu Jensen at SOS Elections and the document I cited during our Compliance meeting is a training manual (see attached doc titled Chp 5 Section 1). He confirmed the language is accurate and that only a candidate or political party can request a recount for a political office and whoever the requestor is will be billed for the cost. He also indicated that the third line of RCW 29A.64.011, "Any group of five or more registered voters may file a written application for a recount of the votes or a portion of the votes cast upon any question or issue. They shall designate one of the members of the group as chair and shall indicate the voting residence of each member of the group. " applies to ballot measures and the like and not races for political office.

12/13 - Tanya spoke w/Steve Gardner 360-337-7128 (Kitsap County PIO) and he provided the attached document showing who the parties are that requested the recount (see attached doc titled Recount Request 2022). None of the individuals are the candidate but Steve indicated some of them are PCOs. He also indicated the count is underway. I explained we are not looking to stop the recount but are asking questions to better understand who made the recount request and is responsible for the fundraising effort. I pointed out to him what the SOS office explained to me about who is allowed to request a recount in this instance and he was going to go and have a conversation with some folks to determine next steps. He said he would get back to me.

12/14 - Tanya followed up w/Steve Gardner at Kitsap County and they are proceeding with the recount and he estimates it will be complete next Thursday. Steve said they had previously reached out to the SOS and were not told the same thing I was told. Regardless, they think they are in compliance with RCW 29A.64.011 because they are interpreting the word "question" to literally mean if there is a question with the votes this allows the group of 5 to request a recount.

---

by **Kendra Hodgson** on **Tue, 13 Dec, 2022 at 2:46 PM** as **Private note**

Adding you to the ticket thread connected to outreach happening with Kitsap Co.

---

by **Tabitha Townsend** on **Tue, 13 Dec, 2022 at 3:10 PM** as **Private note**

full screen capture of website

<https://www.givesendgo.com/RecountKitsap?fbclid=IwAR3vawjdpIX6tYQygGJXu4pFGm9YvowsQ1PASyiCvkdOHwrfVJS7kRXHI8> (<https://www.givesendgo.com/RecountKitsap?fbclid=IwAR3vawjdpIX6tYQygGJXu4pFGm9YvowsQ1PASyiCvkdOHwrfVJS7kRXHI8>)

---

by **Peter Lavallee** on **Tue, 13 Dec, 2022 at 4:01 PM** as **Private note**

Tanya, thanks for the quick research on this.

I'm guessing that you quoted the wrong sentence from the statute in your note above and that you meant to quote this: "Any group of five or more registered voters may file a written application for a recount of the votes or a portion of the votes cast upon any question or issue" ?

Thanks again.

---

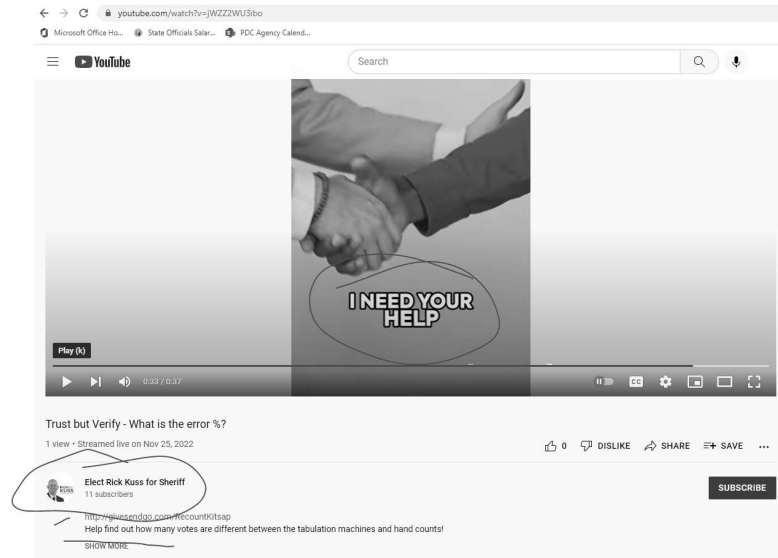
by **Tanya Mercier** on **Tue, 13 Dec, 2022 at 4:15 PM** as **Private note**

Yes! Thanks for catching that error, I've fixed it in my note.

by **Kendra Hodgson** on **Wed, 14 Dec, 2022 at 3:09 PM** as **Private note**

Additional detail as part of research:

[Discussion Item - Use of Campaign Funds for Post-election Expenses.pdf \(wa.gov\)](https://www.pdc.wa.gov/sites/default/files/2021-09/Discussion%20Item%20-%20Use%20of%20Campaign%20Funds%20for%20Post-election%20Expenses.pdf) (<https://www.pdc.wa.gov/sites/default/files/2021-09/Discussion%20Item%20-%20Use%20of%20Campaign%20Funds%20for%20Post-election%20Expenses.pdf>).



by **Scott Haley** on **Wed, 14 Dec, 2022 at 3:10 PM** as **Outbound email**

William Campbell,

On December 5th you requested clarification on whether the group of six registered voters including yourself is required to register with the Public Disclosure Commission as a political committee. We are working with our General Counsel to determine our answer to this question. I apologize for the delay.

Thank you,

--Scott Haley

Filer Assistance Specialist

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.



9/28/23, 1:37 PM

wapdc.freshdesk.com/helpdesk/tickets/archived/114625/print

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov> (<http://www.pdc.wa.gov>)

1.360.753.1111

---


by **Peter Lavalley** on **Wed, 14 Dec, 2022 at 3:26 PM** as **Private note**

Attached is a "clean" version of the YouTube screenshot without my markings.

← → ↻ 🔒 youtube.com/watch?v=jWZZ2WU3ibo

Microsoft Office Ho... State Officials Salar... PDC Agency Calend...

☰ YouTube Search 🔍 🎤




Play (k)

▶ ⏮ 🔊 0:33 / 0:37 ⏸ CC ⚙ 📺 🖥 🗲

Trust but Verify - What is the error %?

1 view • Streamed live on Nov 25, 2022

👍 0 🗨 DISLIKE ➦ SHARE ≡+ SAVE ...

 **Elect Rick Kuss for Sheriff**  
11 subscribers

<http://givesendgo.com/RecountKitsap>  
Help find out how many votes are different between the tabulation machines and hand counts!

SHOW MORE

SUBSCRIBE

---

by **Kendra Hodgson** on **Wed, 14 Dec, 2022 at 3:26 PM** as **Private note**

Scott,

Below is the detail that has been reviewed and can be provided to Mr. Campbell.

Mr. Campbell,

Thank-you for your patience as your question was reviewed.

Funding recounts is a campaign activity normally funded by candidates or political parties and is disclosed through reports to the PDC. If a group other than the candidate or party is funding the recount, it would need to register a political committee and report the activity.

Please also note that coordination with a candidate can qualify a group's expenditures as campaign contributions that need to be reported by the candidate's committee as referenced in **WAC 390-05-210** (<https://apps.leg.wa.gov/WAC/default.aspx?cite=390-05-210>). (<https://apps.leg.wa.gov/WAC/default.aspx?cite=390-05-210>)

---

by **Scott Haley** on **Wed, 14 Dec, 2022 at 3:30 PM** as **Private note**

Thanks, Kendra. If only I'd waited a few more minutes to reply to him...

--Scott

---

by **Scott Haley** on **Wed, 14 Dec, 2022 at 3:36 PM** as **Outbound email**

Mr. Campbell,

Thank-you for your patience as your question was reviewed.

Funding recounts is a campaign activity normally funded by candidates or political parties and is disclosed through reports to the PDC. If a group other than the candidate or party is funding the recount, it would need to register a political committee and report the activity.

Please also note that coordination with a candidate can qualify a group's expenditures as campaign contributions that need to be reported by the candidate's committee as referenced in **WAC 390-05-210** (<https://apps.leg.wa.gov/WAC/default.aspx?cite=390-05-210>).

Thank you,

--Scott Haley

Filer Assistance Specialist

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov> (<http://www.pdc.wa.gov>)  
1.360.753.1111

---

by **Cbcampbell56** on **Mon, 19 Dec, 2022 at 7:02 AM** as **Incoming email**

External Email

Good Morning Scott,  
Thank you for working on my questions. Will you please point me to the portion of the law that was used to make the determination? It took your group quite awhile to figure it out so I'm pretty sure it's beyond my ability to find.

Please excuse the delay in my follow-up question. The recount started Monday of last week which was also the day my Father-in-law died so I haven't checked e-mail in the past week.

William Campbell

---

by **Kim Bradford** on **Mon, 19 Dec, 2022 at 7:43 AM** as **Private note**

I think we can direct him to RCW 42.17A.005(41) which states: "Political committee" means any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures **in support of**, or opposition to, **any candidate** or any ballot proposition." This group has called itself Friends of Rick Kuss and the candidate himself has promoted their efforts and appealed to people to support them.

I would also point out that the guidance you provided last week is in keeping with your original communication on Dec. 5. The delay here was not due to us needing to research RCW 42.17A, but rather to find out more about the recount. Our understanding has been that only candidates themselves or political parties could request recounts of candidate election results.

---

by **Scott Haley** on **Mon, 19 Dec, 2022 at 9:02 AM** as **Outbound email**

William Campbell,

The delay in our response was largely due to our research into the question of whether someone other than a candidate or a political party committee could request a recount of an election for office. My recommendation that the group register as a political committee was based on RCW 42.17A.005(41) which states: "Political committee" means any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures **in support of**, or opposition to, **any candidate** or any ballot proposition." I understand that the organization requesting funds is called the Friends of Rick Kuss and that Mr. Kuss has promoted their efforts and appealed to people to support them.

Thank you,

--Scott Haley  
Filer Assistance Specialist

Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission  
<http://www.pdc.wa.gov> (<http://www.pdc.wa.gov>)  
1.360.753.1111

---

by **Cbcampbell56** on **Thu, 22 Dec, 2022 at 11:01 AM** as **Incoming email**

External Email

Hi Scott,

I hope you are enjoying this Christmas season as we prepare to celebrate the birth of Jesus so many years ago.

I appreciate your time given to provide me with help and advice. It seems that we have a different understanding of the group that was formed as prescribed by RCW 29A.64.011 to submit the application for a recount so I want to try and give you some information that you had no way of knowing when advising me.

I was never part of the organization called the Friends of Rick Kuss, if such an organization exists. I did write a check that was intended to help an effort in raising funds for a recount but the manager of the GiveSendGo account for the Friends of Rick Kuss opted not to process the check and told me the check had been voided.

I was invited to a small gathering that turned out to be a general discussion of a lot of different things that might possibly be wrong with the election system and processes in our country. During that discussion I was shown RCW 29A.64.011 and read how any group of five or more registered voters may file a written application for a recount of the votes. While attempting to move the discussion toward something we as a group could actually do to move the election fraud debate forward, I was asked if I wanted to be chairman to which I immediately responded that I did not want to take that position. After another fifteen or twenty minutes of discussion about various concerns with the elections, I recognized unless I took the chairman position nothing productive would come from the gathering.

As designated chairman I informed the group that I would take the task of preparing the written request for the recount and that I did not want any political party or political campaign involved with our group. The final discussion of the evening was funding. In that discussion I told the group that I was willing to donate about 10% of the required deposit and, because the deposit was required in no more than two days from the election certification, that I could loan an additional 60% of the deposit.

I asked for another meeting to have the group of six registered voters each sign the written request for the recount that I had prepared and receive the remaining 30% of the money needed for the deposit. We met the evening before filing the request. The plan was to file the request when the auditor's office opened in the morning. I did not want to risk any bank holds being placed on checks so I requested cash be provided.

At the meeting, the six registered voters signed the request and the money for the deposit was pooled. I also learned that nearly all of the money that was added to the pool came from a credit card cash advance. Because I personally do not advocate credit card debt and to try to keep as much money as possible circulating within our local community, I returned the money that came from the credit card cash advance. Consequently, all but \$50.00 of the required deposit for the recount came from my personal funds.

While my group of six registered voters all support Rick Kuss at varying levels, the reason for requesting the recount was to perform an independent check of our election system here in Kitsap County.

I think that RCW 29A.64.11 provides the legal path for our group of six registered voters to request a recount without being affiliated with a candidate or political party committee.

I'm willing to answer questions you might have on this information as we strive to come to a mutual understanding on whether or not someone other than a candidate or a political party committee can request a recount of an election.

William Campbell

---

by **Scott Haley** on **Thu, 22 Dec, 2022 at 11:43 AM** as **Private note**

Hi Kim,

This is concerning the matter of William Campbell paying for a recount with five other people. Tabitha Townsend attached a screen shot of the GiveSendGo web page to appeal for funds for Friends of Rick Kuss to this ticket. That made me think that William Campbell was involved in that effort, but in his most recent reply he said that he wasn't. He still doesn't believe that he should register the group as a political committee.

Thanks,

--Scott

---

by **Kim Bradford** on **Tue, 27 Dec, 2022 at 9:50 AM** as **Private note**

Scott, wanted to make you aware that we now have a complaint about this activity so we should probably hold off on providing any additional answers and let the enforcement process sort out this group's registration and reporting requirements. Jordan and Tab. T are both out today, so I don't expect we'll get notifications of the complaint out until later this week.

---

# EXHIBIT 6

**PDC 115649 William Campbell 6 26 23**

JENNIFER: Okay. All right, so, it is recording and it's doing a transcription, and really that's only for my purposes to be able to review the recording a little bit easier.

WILLIAM: I understand.

JENNIFER: Yeah, So, the purpose of this today is to have a conversation between Jennifer Hansen, who is conducting this conversation. I'm going to refrain from calling it an interview because I don't think it's really an interview. Jennifer Hansen and I am a compliance officer with the Public Disclosure Commission, and I'm speaking today with William Brian Campbell. Mr. Campbell, I want to make sure that you are aware that you are being recorded.

WILLIAM: Yes, I am aware I'm being recorded.

JENNIFER: Great. The purpose of this recording is so that we can have a discussion about the current information that is available regarding case number 115649 and also to have Mr. Campbell include any additional information verbally, and then I, Jennifer, might have some additional questions. You might answer my questions, Mr. Campbell, and if you don't, then I'll go ahead and ask them at the end.

WILLIAM: All right.

JENNIFER: And then this information that is being recorded today will be available to you, Mr. Campbell, when it's done and it'll be transferred into a stipulation of facts that you will also be able to review. That stipulation of facts will be going to our commission at the July regular commission meeting for their review to consider the matter before us, which is whether your actions required registration and reporting as a political committee. And so, excellent. And so, what I want to do is just to allow you, if you would, to go through the time frame. I'm kind of starting at the beginning of the process. Again, I know that you've already provided a lot of that information to me in writing. I'd like to have you just talk about the beginning of this process, how you came to decide to become part of the recount effort for the Rick Kuss campaign, and kind of go through that narrative as to how you became aware of that option, how the signature, or not the signatures, but the funds were gathered to pay for the recount, and then that process that you went through to actually go through the process of getting it certified and making that request, paying the deposited amount, and then having the recount done. And then anything you want to talk about the results themselves and how you disseminated the information about the results through your own process at the end. So, anything you'd like to tell me. Again, you're welcome to tell me the same information you've already provided and anything new that you think might be relevant. So, I'm just going to let you talk and I'm going to wait until the end to ask my question, if that's okay, just so I don't ruin your train of thought.



WILLIAM: That's all right. And I'm okay with questions in between, but you're right that I may lose train of thought and go, now where was I?

JENNIFER: Exactly, and I also want to let you know if you need to take a break for any reason, let me know and I can stop the recording and you can start that again if we need to.

WILLIAM: All right, sounds good. So, beginning. So, the election was November 3rd, I believe. Don't remember. We're talking six months or more ago now. So, anything that I wrote closer to the time frame is probably more accurate than memory right now if I'm going directly off of it. But let's see, and I have been reading through emails, and notes, and things like that in the last little bit, so I am a little bit fresher than just complete cold call right now. So, I started-- I guess I first became aware of a recount being considered or desired via social media posts that I came across on the day before Thanksgiving. And so, when I saw that, it was basically a post that said we're raising funds to do a recount, you know, get the word out, and those sorts of things. So, I clicked on the link to the GiveSendGo account and they were talking about we would like to have a recount, not to overturn the election, but just so that we can look. And then, here's-- the thing that was the real trigger for me was at this time, there was a whole bunch of discussion, and there still is, about can the machines be trusted to count the vote? And I understand that machines can be programmed to do any number of things, and they can do it however the programmer puts it in, and you could put all kinds of things into a machine code. And in my mind, a machine, if it's counting, should count integers and it should always go up. Whether our machines were doing that or not was something that is debated back and forth and so I said I'm all in for a recount. So, I contacted the person who had made the post and said I'd like to do this but I don't like using credit cards. I think that's, again, another part of a problem that we have as a society is we need to try and keep our money local as much as we can, and I'm not really in favor of donating some money, and then having a bank somewhere back in the East Coast or in another country get a cut of the money. So, I would like everything that I'm donating to go directly to causing the recount to occur without anybody else getting a cut, including the fundraising organization or website, however that works. Because I know they get a cut, I know that bank gets a cut. Anyway, just generally opposed to that whole concept of how we should be conducting our lives. So anyway-- So, this was the day before Thanksgiving. So, by evening, we'd figured out how we could make contact and I delivered a check for that evening and said you know here's my contribution. I would really like to see this happen. And in that exchange, she told me that, pointed out that during the counting of the ballots that there had been a, and I'm going to get-- there's an audit that was done basically to check the machines was the concept of what it was where they would pull ballots that are ready to be counted, they would hand count those ballots, and then they would check to see whether the machine counted the same amount. And it turns out they did. There were 400 and some odd ballots, and it's written in the reports that I've provided to you of what they were. And the results of that audit was Rick Kuss had 60 percent of those ballots and Sheriff Gese had 40 percent, which by the time the election came out, which we're talking now a month after the election or so, the results were the complete opposite where it was final outcome that was certified was somewhere around 60 percent for Sheriff Gese and 40 percent for Rick Kuss. So, just my intuitive thought of the math. Now I took

a statistic class and I didn't understand hardly anything that went in it when I was in college, but I do understand the basic concept of you take a large enough sample, you can predict the outcome of what's going to happen. So, if you have a random sample of 463 I think it was ballots and you count them, that should give you a pretty strong indicator of what the outcome of the election is going to be. Just an aside, as I've been watching for this and I actually sent that information out to a bunch of different people that said, hey can somebody help me out here because I don't really know how to set up the math to go do this, but I know that there's a way that we can say if this is a random sample of ballots here's how many we should be able to end up with. The probability of error. And not only are they projected voters or likely voters, this was actual votes cast, so it should be a higher level of accuracy than a random polling sample, which this weekend I noticed that somebody did a sample and they're doing a nationwide projection of what the country thinks or what an outcome would be based on a thousand votes for the nation. And here, I'm talking about 200,000 votes and I've got 463 actual ballots in hand. So, that just didn't sit right with me. It seemed like there's a problem and there was something I didn't know. Turns out, and I'm going to jump ahead in the story just because it fits in right here, is that subsequently, I had a conversation with the director of elections. And the sampling is you're supposed to-- The test is to run a sample of the ballots that you have available to count at that time. Well, it turns out that because there was a lot of write-ins going on because of the way that Washington state runs our primaries is that there were a single party represented for secretary of state, so it turns out that there's a write-in campaign that goes on. So, the ballots that we had as a sample were not a random sample, they were skewed one direction because the ballots that were ready was because they'd just been processing all of these write in ballots. So, those were the batches that were ready to be run were ballots that had hand handwritten entries in them, and so it doesn't surprise me that it was skewed 60-40 for Rick Kuss. So anyway, that's just kind of a side but takes you to where I understand why the actual results came out different than this random batch audit. I think I got the words right there. So anyway, I watched that, which even made me even more convinced that I wanted to have this the recount occur, which is its sole function, in my mind in my perspective, is to check whether we actually had machine count match actual ballots in hand. And that's what the GiveSendGo account thing said at the time too is-- I don't have it in front of me, but I believe that it said something along the lines of we're not trying to overturn the election. We recognize that it came 60-40. And my thought is that if we do a recount and it does actually overturn the election, then I'm done. It will get wheels of its own and the auditor will have lots of questions to answer and at that point, things will start working out and I won't need to be involved. So, it was just a way to move the community discussion forward because right then, and still all you do is have people arguing like well this could be happening, or that could be happening, or all kinds of different things could be going on and happening. I trust the machines. It could be the adjudication of the way they entered the data into the machines. You know, all of these things could happen and if we do a hand recount, you ultimately end up with the re-adjudication. So, whatever had been hand adjudicated, if they'd been doing like batch adjudication, which was something that somebody had thrown out there is that when we have ballots that the machine is not going to be able to read and you've got a hundred of them that with a stroke of a button, they can have all 50 of those ballots go to a candidate, or a cause, or whatever it is with little to no oversight. And if we have this hand

recount, you will be able to-- every single one of those things that were adjudicated, however it was adjudicated, is going to be adjudicated again real time in front of people that are watching that thing happen. So, I saw it as a way to move forward with we can't rule out all of the theories, but at least we can take one data point and we can say in Kitsap county, we have a race that is counted only by this elections department. There were other races that could have worked, but this was the one I was interested in. It was one where the candidate was interested in having a recount done, so it was a good vehicle to move forward. To have a hand recount that would be a data point that would tell us something instead of just throwing theories out and being able to argue one way or the other. Anyway, that's a lot of rambling on that. So anyway, this is the course of Thanksgiving Day and Thanksgiving weekend, and so this whole thing is moving along. Monday morning was a canvassing board meeting, which I attended. I'd never been to a canvassing board meeting before, but because of things that were transpiring and my interest now in the recount being actually something able to be done, I went and watched the canvassing board meet and it was kind of the trying to get things lined up so that they could certify the election the next day. I know there's timelines that they were all working toward and however those work is fine. And so, this canvassing board meeting, there were-- Mr. Kuss was there and other people. There were maybe a dozen people there, and I briefly talked with Mr. Kuss and asked him whether he really wanted the recount or whether he was on board with it. He said yeah he really would like to see a hand recount. I can't remember what his particular things were that he was interested in. I'm gonna-- It's UKAVA, OKAVA, something like that. I don't know what the acronym stands for other than it's I think votes that come in from overseas, military or something like that. He was interested in knowing what those results were, and I don't know whether he thought that the hand recount was going to get him that information or not. Anyway, I didn't want to be pushing for a recount and have the candidate say I really don't want a recount. What are you doing? Just because, I don't know, I'm a rookie to this sort of stuff. And you know, in retrospect, I think that it would be nice if we had people that just step up and say yeah I'm going to go do this. Nobody's involved whatsoever. Neither one of them had asked for it. I think that probably would have been optimal, but, you know, that's not what happened. It was just-- That's the way things developed. So, you know, I had the-- The elections department prepares the report, they present it to the canvassing board, there's some things that they asked the canvassing board to do. The main thing that they needed to do was there were a thousand signatures that didn't match, and the canvassing board needed to make the final call as far as the election department looking at them and saying we've got a thousand ballots that we just think are not the right signature on the ballot. And so, then the canvassing board either confirms or, I'm not sure, rejects. Whatever the right word is there, but makes the final ultimate decision of whether the ballot is going to be accepted or not. I don't know what the final outcome was. I watched them making their decisions. Interesting process that I don't need to go over here I don't think. And so, I think most of them ended up being rejected, but it would be interesting to know what the percentage was just out of curiosity, but I will find that out in the future how things work along those lines. Anyway, we get to the end of that meeting and I honestly don't remember who all was there that I knew. I know that there were people. Yeah, the assistant auditor who was overseeing the canvassing board was there and made a speech that offended a bunch of people, including-- I thought that he was out of line, but, you know, I just said that's okay. I don't have a

dog in this fight, but it seems like that's a little out of line. I don't remember exactly what it was. It's recorded. You can go listen to it if you want to. And the only reason I bring that is I was trying to remember who was there. I remember the next day, there was a gentleman that regularly is involved in the elections and auditing, and he showed up and addressed the canvassing board and particularly that speech that the assistant auditor had made and was very offended by it because it was-- he felt derogatory towards him and his efforts. So, of course, now things are slowly coming back to me. The speech had been something along the lines of we accomplished this election in spite of the difficulties that were introduced by having-- and I'm not going to get the right words, but my own word. Not sure exactly what this was, but combative observers during the process, and this guy who'd been a regular observer said you know I take offense at that. I was not-- I saw maybe a little bit of what you're talking about, but that wasn't characteristic of the election. So anyway, he was a person that was there, and then there was a person that I had known for and met many years ago, somebody I went to church with 20-25 years ago and hadn't seen for a long, long time was there. And no recollection of who the other people were that were there. So, sometime after that meeting and exchanging of pleasantries with various people, I'm not an extrovert, so I tend to not have long conversations, but the social media account contact person that I talked to before said that they were meeting that evening and would like me to attend to talk about the recount and if it could be done, or if it was possible, or any of those things. So, that's kind of like-- That's Monday evening. Then I attended the meeting and there were half a dozen of us or so there. And some of the people that were at the canvassing board I recognized as being there, which you know, mainly the only one that I remember is my-- the person that I already knew from 20 years ago I remember seeing there. And then, my social media contact person and person and-- Anyway, I can't remember. So, it was a new group of people, and then, as you can imagine, it's one of those discussions where all of the different things that could be going wrong, things that might be going wrong, things that were certain are going wrong, but with no direction towards solutions of what we're really going to accomplish here. And I said, you know, I'm still in. I would like to see this happen. And in fact, I'll even kick in some more money just because I would like to see the recount happen. So, at some point, the RCW that we were working to, 29 alpha 064 11, which talks about how a group of six voters can petition to have a recount done and you've got to follow all the rules that are in that section. And I read the section that was pointed out and thought oh this really could be something that happens outside of somebody on the ballot actually requesting the recount because I guess, you know, just going back in time, part of the whole election discussion thing is that everything keeps it-- From my perspective, everything kept getting thrown out or sidetracked because nobody had standing. If you wanted something to occur with the elections, the courts would say you don't have standing so you can't bring the suit or you haven't actually been hurt yet so you can't bring the suit to change anything. It seemed like no matter what happened, from my perspective, there was standing that the courts didn't allow to ever occur any challenge or any meaningful close look at what was really going on in the election process, but it looked to me like, and I still think that's what it says, is that section in our code allows us to actually go in and have a look, and the auditor read it the same way, which is, you know, if somebody comes in and meets these requirements in this 29 alpha 064 11, they're going to be able to request a recount. And so, that's kind of where we were in the meeting. And in order to move the path forward, we would have to

use that method. Now, it gives you 48 hours I think from the time the election is certified to make the request, which just logistically, I was aware of the fundraising account, obviously, because that's how I got pulled into the whole thing. Pulled in is not really the right word, but got involved, became aware, whatever the right word is. So, in order to make progress forward, you have to-- it lays out things. You have to have, six you have to have somebody be the chairman, and a bunch of other things. I don't remember exactly what. You have a way you have to make the request. And I'm okay with doing paperwork. I like doing that kind of stuff. Like isn't the right word. I'm comfortable with doing paperwork. And so, my preference is to not be the leader. I'm a good deputy. I would rather feed information to a front person that likes to then be in contact with people and say here's what we know. And so, I'm more of the researcher type. So, of the people there, nobody was really willing to step out and be the leader, the chairman. And there's probably a certain element of, you know, I don't know what you're getting into because I know politics is a blood sport and I really don't want to play. And so, you know, as was usual for me, I tended to be quiet and let the discussion go where it wandered off to. And you know, I was sitting there listening. You know, it's like Lord what do you want me to do because I really don't want to do this? And so, then there's the things that I processed through of, you know, there's Moses and the burning bush. He didn't want to go do what the Lord was asking him to do. And he ended up having to have Aaron go along and be a spokesperson, and it would have been better if he would have just done what the Lord asked him to do. And then, of course, there's like the Jonah story where he goes the opposite way, and bad things happen, and then he ends up doing what the Lord wants him to do anyway. So, I'm thinking I don't really want to do this, but Lord if you want me to do it-- Summit, it's just me. Sorry. Yeah. Summit isn't used to me saying ah. Anyway, I-- Want to come over here, Summit? So, I did not want to do it. I didn't want to be the leader. I wanted to be a support person, I wanted to provide funding, I wanted other people to do the work, and I think that's part of the problem that we've got is most people want to just do the work-- not do the work. They would like other people to do the work. So anyway, after some period of time, I said, all right. I'm willing to be chairman, but if I'm going to be chairman, it's got to be separated from any campaign. I don't want any connection with a campaign or political party when we go do this because I don't want to be part of that. I also am aware, although, you know, in the last six months, I've become more versed in understanding the rules, but I do understand that if you're running a campaign, that there are all kinds of rules on finance and things like that, and I didn't want to get involved in those things, which I'm now completely involved in. So anyway, that was my take on it. I said I will go and draft the request because tomorrow morning is the certification of the canvassing board. Logistically, the money that's in the GiveSendGo account is not available to us, and so we pretty much have to come up with the money amongst ourselves, and I'm willing to front some money. I would like to not end up paying for a big chunk of it. I would be willing to front money with hopes that someday that it would be given back to me. And so, I guess that's kind of where the meeting ended is, you know, we need to figure out how to get a bunch of money in two days because that's the timeline that we've got. The GiveSendGo account is useless to us because you can't get the money out in the two days and have it available. So, that puts us at the end of Monday night. Tuesday morning, we end up with a canvassing board meeting, which is a fairly succinct meeting, which you know then the canvassing board actually I did appreciate the way that they allowed comments to run on

because the gentleman who had been offended the day before was able to make a comment. The assistant deputy, assistant, the auditor, deputy auditor? Anyway, whatever his title is responded, which then the gentleman took offense at of, you know, you're trying to not accept responsibility for your words, and then, you know, that went on. It was kind of interesting but not particularly relevant to our discussion. The election was certified. Then I approached the supervisor of elections and said appreciated all the work that she'd been doing and that we were likely going to request a recount, which of course, they've just completed this long, you know, election season, they're looking forward to vacation, and the last thing they want to hear is somebody's going to ask for a recount. But anyway, I ended up talking fairly extensively then with the director of elections and the auditor, and that's where I learned how the random batch audit ballots were selected and why they might be skewed, which then caused me to rethink whether I really wanted to do this or not because now that I understood why you would end up with the count different like that. But at the same time, once things were in motion, I also felt like I had obligations to continue on the path that I believe the Lord had placed me on of saying we're going to get this recount. So, I'm balancing the part of me that says the math now makes sense so I wouldn't necessarily need a recount. I still think it would be really good to be able to say here is a sample where we've got complete control of the machine. There is a single machine. There is a single elections department. There is a single batch of ballots that's confined to a single geographic area where we can narrow this down and say do the ballots match what the machine did? In the course of-- And so, now I'm going to go back in time, you know, because after the meeting, then I stayed up late and I read the RCW 29 alpha 06411, and of course, if you keep reading through there, things jump out that I didn't notice in the meeting such as here's the price, which we thought was the price of what it's going to cost. At home, I read it and said that's really not what it's actually going to cost necessarily. That's the deposit that you're required to make. It could be a lot more, it might be less, and I have no way to control that, which again, makes me really nervous as the point guy going in there, which as far as I can tell, if you commission to do this recount and costs go over your deposit, somebody, and I would guess it's the chairman, although it's not clear, it could, if it came down to a court, I'm guessing, end up being everybody that signs the piece of paper has to cover the cost and somehow chip in and figure out. It's not clear. It just says that's the deposit and this group that we just formed I'm sure is going to be ultimately the group that is responsible for paying for everything there. So, that gives me pause as well. Now I'm not sure-- Well, I'm fairly sure that the election is going to-- I mean the recount is going to look just like the machine count. The election staff is very confident that their machine is doing exactly what they think it's supposed to do, which I told them I would expect them to resign if they didn't think it was doing exactly what they did. So, I'm very comfortable with them taking that position and I just am trying to make sure that it is in fact the machine does count accurately. So, where are we at in this story? So, we had a long conversation, and actually, I felt like it was a very productive conversation and a conversation that should be had more frequently. And they encouraged that, the election staff, of we really would like people to come in, and talk, and learn, and understand, and they were very receptive to answering questions and understanding where we were going. So, this is Tuesday. Certification has started, so the clock is ticking. We have, by my count, until Thursday morning to either request and provide money or not. I don't remember what transpired the rest of the day. I know that I was thinking about it,

agonizing over do I really want to go through with this. I asked the auditor to give me a rough estimate of what he thought of what he thought that was going to end up being costing. And so, that's what I did when I went home is I started saying okay now if I were going to do this, here's how I would start laying out the costing of where it would come out to be. And so, it ended up being somewhere around what the deposit was is what I felt like was going to be a reasonable estimate. I sent that to the auditor, didn't hear anything back from him. I spent some time trying to make sure that we were in communication. I believe Wednesday sometime later in the-- I'm not going to say later in the day. Probably mid afternoon or sometime, the deputy auditor contacted me and said the auditor is aware and he's working on it, trying to come up with a reasonable estimate of how much total it's going to be. Wednesday night, I said we've all got to get together again because I want-- There's no requirement that anybody sign the request other than the chairman I believe, but I wanted everybody else to sign that was going in there just because the statute says there's got to be five. I believe registered voters must be registered because you would have to necessarily be to have cast a ballot. I don't know for sure how that goes, but I wanted other people to sign the paper besides me. If they're not willing to sign the paper, then I don't want to be the guy standing out in front holding the bag with nobody backing me up saying yeah we do want to go do this recount. So, little dog's dreaming over there. You probably didn't hear it's a little woof. Where are we at? So, we're approaching Wednesday evening. I, during the course of the day, had been working up the request. The request is you know not as nearly as polished and flowing as I would like it to have been, but it's kind of-- I started out with here's what I think I need to put, then the auditor had said make sure that these things are in there, and oh, by the way, one of the things you're asking, which what I told them is all I want is-- I don't care if you sort the ballots or any of those bookkeeping things. All I need to do is I want to count all of the ballots and all of the votes and see what they say. I don't really care whether it's broken down by precincts or whatever it is. And so, that was part of the discussions after the canvassing board meeting where I was talking with them saying we're thinking about the recount and, you know, they were very good at saying we're not trying to discourage you. You know you can do what you're allowed to do. How do I say this? Since we're not on the record, I'm just going to go ahead and say this that, you know, they-- I believe it felt to me like the word said you know you can go ahead and ask for the recount and all of those things, but they provided data that would tend to discourage me from going forward with the recount. They pointed to the Emily Randall recount for whenever that was and said that the cost of that one ended up being elevated because they'd had to go hunt for a ballot that had been misfiled. It was supposed to be in one precinct and it actually was in a box for another precinct, and so when they did the recount, they weren't counting all of the precincts. They were counting a select portion, so they had to go find that one. And that ended up elevating the cost. So, you know, as the guy that feels like he's going to be held personally responsible for any cost that's in excess-- Well, total cost is-- You know, I'm very sensitive to what are we doing that's going to drive the cost up? You know, and quite honestly, I recognize that if I had an elections department that did not want to cooperate and was going to be adversarial, I mean, all they have to do is slow walk it and they'll break me on the first short little while. You know, I can't fund a slow walk of a recount. And to their credit, they never once did that. Everything that they did was making improvements to streamline the process to cause it to, the recount, to get done the fastest and

most efficient way possible. And so, anyway, my initial request had just been all I want is you to count all of the ballots and I don't want any of the extra stuff that goes with it. And then, the auditor had said well by law, I'm going to have to do these things in order to do the accounting, and you know, I don't know exactly what all went into that, but those little elements got woven in, and woven is not really a good way to describe it, but you know, it's not my best work is all I'm trying to say. The recount request, it started, and then it got things plugged in, and it's like well, I can get that in if I can just change these words a little bit. And so, it it's not a beautiful document, but it did the job. It's got the six people that said yes we're on board with you, willing to go do this. Sign it and so this leads us to that I've been working on preparing that so that it was going to be ready and I needed a meeting Wednesday night with the group of six people that-- We had formed our group on Monday night and I said I need I need money, and it can't be checks because checks are useless to me by nine o'clock in the morning. So, I need cash. Whatever you can do and I can front some money. And so, that's what we did. We gathered Wednesday night. There were some minor edits, improvements to the request. We printed out the request, we all signed it, collected money. There was a big chunk of money, and I don't know that it matters, but it was ten thousand that had been withdrawn as a loan on a credit card. And as you can imagine, I had an opinion on using credit cards, and then-- I mean I don't even like paying the service fee of credit cards let alone the huge interest rates that you have to pay if you borrow money on a credit card. So, I am adamantly opposed to borrowing money on a credit card, which I guess won't go there. Anyway, that's what people do functionally if they don't pay off their credit card at the end of the month, which I'm also adamantly opposed to. So, you know, a loan is just abhorrent to me. We don't do that. And anyway, ultimately, I returned that ten thousand dollars and covered that with my own personal funds as well. So, let's see. And so, that was really all the meeting was other than we're going to meet at the auditor's office. I've got five minutes left in the meeting it just said.

JENNIFER: That was that was just because I allotted an hour.

WILLIAM: Oh. So, I'm rambling on way too much.

JENNIFER: I'm not going to cut you off. That hour was for my benefit, not necessarily for yours. So, I just wanted to make sure we had at least an hour of my time, and I have nothing else that I need to do beyond this right now, so feel free to continue discussion.

WILLIAM: All right. So, the only other thing was we needed to provide the money to the auditor. I thought by 10 o'clock the next morning, and again, it's because I'm quite the literal-- If you follow the rule, there's 48 hours from the time that you certify. Other discussions with the auditor, and maybe previous to this as well, I'm not sure, were that you can-- He calculates it to the end of the business day. So, the auditor would have accepted the request until the end of the business day on Thursday. Being the literal person that I am, 48 hours was going to be up in the morning, so regardless of what the auditor was willing to accept, the letter of the law was 48 hours, and so I was going to have the request in before the 48 hours expired or just barely before the 48 hours expired. And so, I said that I would be happy and would like anybody that would



like to meet with me to turn the money in to come along. And some but not all did. And I don't remember who. The only one that I remember for sure is my wife went along with me, and that's the only one that I really wanted the moral support from. And she was there at that meeting too on Wednesday night, weren't you? Yes, she was. And the other request is that I made to the group is I do not want this to be a media event of any kind. I would rather not talk to the press if I can avoid it. I will be the spokesman if we do have to talk with the press, but I am not going to make it easy for the press to get in touch with me. I'm not going to contact them. They have to find me and I'm not going to give them any clues. They're going to have to do their job and find me. So, that was it. I went home, I assembled the cash, I pulled money out of my pocket to supplement where I needed to, and got ready for the next day. The next day, we went to the auditor's office at the set time, which was morning shortly after it opened. I don't remember the specific time. The statute says that you have to pay in cash or certified check. I had been looking up certified check because I understand that checks in some way are easier, but when I looked up certified check, there's cashier's checks, and there's certified checks, and there's a definition between the two. And my understanding was a certified check would be a personal check that I would take to the bank, the bank would certify that that check was indeed fully funded at the time they certified it, which to me is not a good way to function. A cashier's check would have been better, but the statute doesn't say cashier's check. Later talked to the auditor. The auditor said we would have taken a cashier's check. It would have been just fine, but I used cash simply because I didn't know exactly what a certified check meant. I didn't want to take a cashier's check and have them say oh no that's not what the statute says. The auditor's office would have been fine with it. I know that now, but at the time I didn't, so I was following the letter of the law to the best that I could understand it. So, I showed up with the cash, paid in cash, got a receipt. I think that was the end of it. I told the auditor that I had no desire to speak with the press in any way. In fact, I had communication with them before that meeting that said please tell me where I need to come and do this. Here's what I'm planning to do. I don't want to wander around the building trying to get to the right spot. I would like to come, do the job, and get out, and that's what we did. So, that is-- A calendar here. December, December 1st, Thursday. Just trying to think of things that you might want to know. I don't really remember all of the things that went on. I think that there was some discussion with the auditor's office as trying to make sure that we understood exactly what we were developing. The auditor said that the elections department needed to, now that they had an assignment, figure out what they were going to do. They would call a meeting of everybody that's involved when they knew how they were going to go do it. So, I don't know that it's relevant, but I'll tell you anyway. The Kitsap Sun reporter filed the Freedom of Information Act request, and so was able to track me down and called me. So, I was willing to talk with him since he did the work that he was supposed to do to find me. I gave him a statement that I had written and prepared, which did not include anything about funding because it hadn't occurred to me that people were going to be interested in that at that point. He said thanks for the information. Actually, he wanted to interview me. I said I'm really not interested in talking, but I will give you a written statement, which I sent to him. He sent a follow-up request that said good information, but I've got to ask where did the money come from? My first inclination was to say none of your business, or words to that effect, but then I thought about it and said yeah, I can see how that's not going to go across very well. You can tell I'm pretty much a political neophyte. I don't

understand. I wasn't thinking very politically or how things would play out in the press. Anyway, it didn't take me long, and the Lord prompted me after a little bit that said I know that's your first reaction, but you need to take a deep breath and think about that. So, I did send him a comment that said yeah, my first reaction was not right but, here's-- And this was all in one. I didn't send him a I'm not going to talk to you response and then another response. Those were all internal, which are probably nobody's business but mine, but you all know now. I sent him a response that said something along the lines of all of the money came from within the group of six people that have requested the recount. And I called some of it loans because at that time, I was still thinking you know what? I really don't want to-- I'd really rather buy a new tractor than a recount is really what I was thinking. So, anyway, he thanked me and that's basically, I think, the end of my interaction with the Kitsap Sun Reporter. At least for a while, can't remember. So, this is-- I think, probably that was Friday before he got there. So, there's that piece of it. Continued to have some communication with the auditor's office. I forwarded my response to the auditor's office as well that I'd given to the to the Kitsap Sun reporter just to say don't know what the Kitsap Sun report is going to do with it, but if you want to know, here's exactly what I gave the Kitsap Sun reporter. So, if it comes out different than this, it wasn't me. Looking at the calendar here. Saturday, Sunday, I don't remember. So, it turns out that there's roughly a week that transpires between filing for the request and then starting the recount on the 12th of December. One of the things that occurred, and this was probably in the Thursday, Friday discussions with the auditor, is the auditor said you, Mr. Campbell, should probably look into what the PDC requirements are. I said oh, hadn't even occurred to me. Thank you for the info. 1: So, that was probably Friday since I think on Monday is when I first started trying to contact the Public Disclosure Commission. I sent, through the website contact, a request for what here's what I'm about and what I'm doing. Do I need to do anything? And then, I think I also called by phone, and I think probably those two things came together at the Public Disclosure Commission. Ultimately, a-- what do they call it?

JENNIFER: I think it was a Filer Assistant Specialist who talked to you first.

WILLIAM: Yes, those are the exact words I was looking for, Filer Assistant Specialist. Filer Assistant Specialist contacted me. I have his name, but you've got it too. So, very helpful telling me all of the things that I needed to do talking about I need to open a bank account, I need to get all kinds of a whole bunch of stuff, you know, which from my perspective, is way beyond anything that I'm dealing with right now. I gathered money, and I gave the money to the county, and said please count. And if you need more, I'm gonna have to figure out how to get it. Was functionally all that I'd done. And so, all of this record-keeping that was being asked of me was just-- Overwhelming is not the exact word, but along those lines of it seems like this is a whole lot of work and doesn't really apply to what I'm doing, but you know, if it's what's required, I'll go do that. So, he sent me a nice email with links and told me where to go. I went. I actually went on to Secure Access Washington and started to create a committee and said wait a minute. How come you're doing this without actually looking what the rules are and things that are required? And so, I went back to the PDC website, I looked at the frequently asked questions, which I've got in the things that I've sent to you, but basically they're frequently asked questions

about what should occur. The first one that comes up. I don't know what the first one that comes up is. One of them that comes up is are you trying to affect, do something in support of a candidate or a proposition? And my answer is no, I was not. There was nothing I was doing to support a candidate. Now, it's public knowledge, and if you go look I donated money to Rick Kuss' campaign, but this is three weeks after the election. There's nothing that I'm doing that's going to affect the outcome of the election, so I'm not doing anything for a campaign. The campaign was over on November 3rd, and this is a whole other process that's now in place of asking for a recount. And the second one is how fast you have to file? And it depends upon how close to the election you are. If you're more than three weeks before, you have, I think it's two weeks. Doesn't matter. You know what it is. If it's less than three weeks before, you have a couple of days, but the answer to that question was still doesn't apply because I'm three weeks after the election, more than three weeks after the election. So, what's the requirement there? I looked through the law and I couldn't find anything-- I can see where the law says those two timelines, but I'm after the election. So, I've got two elements now that say I'm not really required to file. And it seems like there was a third one, but I don't remember it offhand. So anyway, that was-- So, then I contacted the filer specialist again, said here's what I'm looking at on your frequently asked questions. What do you think? I think that it's saying I'm not required to file. and I think that he went off and asked somebody else, which is the appropriate thing to do. I mean, you know, I'm thinking a filer specialist is going to know all about filing, and so I would expect him to give me all kinds of good information about how to file, but he wouldn't necessarily know on an unusual situation where filing is not required, whether that would-- You know, that's not his area, so I would expect him to go consult with other people, which is what he did. And it took a while. I don't have how long right in front of me, but I'm sure that you have access to that for the response to come in. Seems like we went around a couple of times on this. I probably-- if I pulled up emails, I could see it, but I don't have them here. I printed them. Doesn't matter. But we were in the middle of an exchange of I don't think what you have on your website is anything that causes me to have to file, and I don't want to file just for the sake of filing. I mean, once you step into that quicksand, then, you know, it's not hard to extract yourself. So, I would rather work through to find out whether it's required before I start doing it rather than to start doing it, and then try and say never mind. We didn't really need to do that. So, I'm trying to get answers for that. In the meantime, I don't remember everything that transpired in that week. Actually, I do remember what transpired in that week. So, that was the last week for dad to be alive, and there were things, lots of personal family things. So, I was more worried about taking care of dad that week than actual working on all of the whatever was going on, but there were some meetings that were involved. We had the meeting with the auditor's election staff.

JENNIFER: Mr. Campbell, if you would like to either take a break or, you know, conclude your comments. You just shared something very personal with me that I did not fully know about before, so I don't need you to continue if you want to take a moment or just be done.

WILLIAM: Yeah. I'll be all right. Just a second. 1: So, anyway. That was that week. I know that there were things going on in preparation for the audit. Or the not the audit, the hand count. Sorry. You'd think after six months, I'd be past that.

JENNIFER: Again, I-- Six months is definitely not long enough in my opinion. It's going to take a long time. You probably know that. I'm not gonna fill your head with things that you already know. I know you're a man of faith, and that that's gonna help you through your grieving process.

WILLIAM: Yeah, he was it was a wonderful man. Miss him dearly. Anyway. So, anyway, I've got a blank on that week right now. If there's something in there that needs to be filled in, I'm happy for you to come back and ask me. I can pull up notes, and look, and things like that. The recount started on December 12th. And somewhere in the middle of that week I think is when the answer came back. I don't remember whether the answer came back that yes, we've consulted with staff, which I'm guessing was Sean and maybe executive director. Maybe all of them. Don't know, but everybody, the staff had decided that I should need to file as a political action committee. And so, just-- This is part of where I didn't see that email until later in the week, and just-- Since I've already told you this, dad died on the 12th, which was the day the recount started. Somewhere in the middle of the week, the email response came back, which I was not checking I was not checking email at that point. All I was doing was I was getting up in the morning, going into the recount, and then as soon as my wife was up, and around, and ready to move, I'd bail out on the recount, and say I've got family stuff to take care of. So, I didn't look at any email the entire week that had to do with any of the recount stuff. It was just going through and getting stuff done that had to be done. We had the service on the Saturday, and then I kind of engaged again, sent an email, which if you found it or looked it up, you know, you can kind of see-- You know, I look at it in retrospect of saying okay, you can see where I was not putting a lot of thought into things. I just kind of-- just whatever came to mind I put down on a piece of paper, and then I hit send, which is out of normal for me. I usually put it on a piece of paper, and then I'll come back and look at it, and then say yeah, I probably should rephrase that and things like that. Anyway. So, that's out there somewhere. So, then we're into the Christmas holiday shutdown thing. I mean, Christmas celebration. And then, by the time we get-- I think the next thing that pops up on my radar is the notification that a complaint has been filed, which is-- I was somewhat expecting it. I didn't read any of the-- anything in the press. I kind of went-- Not only did I-- As soon as I submitted the request for the recount, I put myself basically in isolation because I didn't want to deal with extra things coming in. So, I didn't look at social media. I'm not sure exactly when that occurred, but early on, I didn't look at headlines, I didn't watch the news media. People would say hey, did you see the article? It's like I'm aware that it's out there. I don't know what it says. So, the first time I ever read an article was when the complaint was filed and a copy of the complaint was sent, which had included an article. So, that was-- that's the only article that I've read in the press on all of the things that have gone on. So, I think that's probably most of the things that we were after. The recount finished up, then I started working on a report, and of course, because we're a group of six and I specifically did not affiliate myself with any party or campaign, there is no mechanism to distribute the report. So, when I saw the complaint, I thought oh so sweet. This will give me a place to put the report where it's on public record and anybody can go look at it. So, really, I just used that as an opportunity to generate the report. It gave me a deadline to actually get the report done, otherwise it would probably just be notes all over on my table, and nobody would see it, and nothing would be happening with it. Although,

still nothing is really happening with it other than it's available if somebody wants it. And after the recount was done, which must have been the Christmas week I would guess. I don't remember. It's on the record somewhere. Canvassing board met, recertified the results. In my report, you can see what changed in the election. And I would say not changed in the election, what corrections were required based on the hand recount, which it was really kind of nice that what you have is a hybrid result of not just a hand recount or just a machine recount, but you actually have the machine help the hand recount be more accurate. So, I think what we actually have is the actual, honest to goodness, actual accurate results of the election is what we now have because had we just done the hand recount without any reference to the machines, mistakes would have been made, but because we had the machine count that was already there, anytime it didn't match, the election supervisor sent the batch back to be recounted. And there's multiple times that this occurred until the two were able to be reconciled. And when the hand count could not be reconciled into the machine count, then they would go then look and see where the machine made a mistake. I think there was three that I would attribute to machine error and three that were adjudication errors where the machine was told what to do and there was a rule that was incorrectly interpreted at the time that the original count was done. Anyway, I would say that that's-- that we've got the actual real count of what the ballots were is the final result that was certified for the sheriff election. And then, I think, again, part of this is I'm just guessing at what you want, and then I just kind of babble since you've got me on and I'm talking, but I think from there, then yeah. Then I was aware. You know, I started looking into the public disclosure commission, find out what they do fully expecting that the sequence would develop kind of the way that it has based on the way that the complaint was written. And then, so I started looking at meetings. I made a comment at the first public meeting saying fundamentally what I said at the beginning of this is that I think that nothing that I've done falls under the section of the law that the PDC oversees, that this is another section. Whether there's an interaction that needs to occur, I don't know, but like I said, at the end of in my response to the complaint is, you know, it's alleged that I did not file, and it's that's true. I did not file. And there's a whole bunch of reasons why I didn't file, and I think that I'm correct in not filing, and I think we've had a discussion where we talked about, you know, here's how it would play out, and I'm not at all surprised that you came to the same conclusion that your management, I presume, came to. You know, even in the complaint the complainant says you know, I think it's a little sketchy that it's required, but I could see there might be arguments why, you know? And actually, personally, I can see arguments why you would want to know who is funding recounts because as I told the elections department management is that, you know, however this turns out, it's kind of-- From my perspective, I'm getting a-- I'm just paying tuition for a civics class that I never really paid attention to in college. So, it would have-- You know, it's just expensive tuition and that's okay. I don't mind. So, now I'm going to rewind a little bit because something that did happen in that week that I just went blank on in the middle of talking to you is, you know, I'd mentioned that the when we needed to have the deposit that there was no way that the GiveSendGo money was going to be available to go do that, and I didn't even really know for sure how you would go about pulling that out, but it certainly wasn't going to be available within the 40-- and I'd had kind of a hope that it was going to supplement, you know, give back some of the money that I'd given that I personally did not want to contribute. You know, I was willing to front the money.

And so, somewhere in the middle of that week, I don't remember exactly where. If you need the dates, I can go look them up. I-- You know, in my quiet time, I was reminded that I am just a steward of whatever the Lord gives me and if he asks me to use this money for a recount, then who am I to say I want to get some of it back from crowd source funding. So, that was personally convicting for me. I'm not saying that everybody needs to go do that. It's just for me, I needed to let go of that money. And so, at that point, I said, you know, here's how much I'm into it for, which was all of it that I intended to loan plus the additional ten thousand that I had covered because I didn't want other people borrowing on credit cards. That was all money that was to be used for the recount, and I had no claim on it, and I let it go, and I was perfectly comfortable with that. And I sent a message that said to the to the person that manages the GiveSendGo account that said I'm not going to ask for any money. You know, I don't know whether at that point, I still-- At that point, I still didn't know whether we were going to end up needing more beyond the deposit that was down-- was laid down. Otherwise, I would have said we need to just not have the GiveSendGo account anymore, but you know, it's, you know, it's imperfect in trusting the Lord at times. And that was one of the things where it's if it goes over, then my rationale was then the GiveSendGo funds that people had donated would be able to be used to supplement the overage. You know, I'd already said whatever I've put into it that's what the Lord has asked me to do, and I don't understand why, but that's-- I have no claim to it anymore and I'm comfortable with letting it go. And I'm not sure where I was going with that right now other than it turns out that I haven't been asked to provide any more money. The auditor was keeping track early on and kind of had a-- we were looking at how much it was going to cost and feeling like the deposit was going to basically cover. I think maybe if I went and did the math, they finished up quicker and maybe money is supposed to come back to me, but I let it go. I haven't asked them for it, I'm not going to ask them for it. 1: So, anyway, I did ask them to post that on the GiveSendGo account that I was not asking for any of the money to be refunded to me. And I think that's all that I need to say on that. And then, I've been watching the PDC meetings and occasionally attending them since then. And just my intent is to work through this and help the commission come to a good understanding. So, another random thought that just flitted through my mind is that-- and it flitted out again. Lost it.

JENNIFER: Was it a question about the upcoming meeting?

WILLIAM: No, because it was one of those weird-- I've thought it a couple of times in the process of this, but it didn't fit in anywhere, and then it just flitted in and went oh, I should say that, and then in the process of saying I should say that, it was gone again. Aging, what can you say?

JENNIFER: It happens to all of us and it's better than the alternative.

WILLIAM: Yes.

JENNIFER: If you'd like, I could-- I have just a couple of clarifying questions that you did not answer. You did an amazing job of recounting information. I'm using the word recount in a

different way I guess unintentionally. And so, I just have a couple questions, and maybe it'll come to you, and then we can come back. So, going back to-- You had indicated initially when you were made aware through social media about the GiveSendGo campaign, you had indicated that you had initially donated some money. Was that donation part of the money that you ended up spending, the total that you ended up depositing, or was that in addition to?

WILLIAM: It ultimately ended up being part of that what I donated because it was-- there's no mechanism really to use anything other than a credit card on those crowd source funding things as far as I know, and so I wrote a check and the check was never cashed.

JENNIFER: Okay.

WILLIAM: So, I mean, you know.

JENNIFER: So, your intention was--

WILLIAM: I guess technically, I never actually gave money. I wrote a check. When she went to cash the check at my bank, they were going to charge a fee because she didn't have an account at the bank, and she said that's not what he intended, and so she didn't cash the check. And so, you know, there's a piece of paper out there that probably is no longer valid because it's more than six months. So, I'm not sure how that classifies as far as donating. Okay so, I said here's money that I'm going to give. I wrote out a piece of paper that said you can pull it out of my account. It was never taken out of my account.

JENNIFER: Okay, and so, it was just an intention to make a donation. It didn't actually happen. And then, this she that you're referring to I'm assuming is the person that was running the GiveSendGo fundraiser.

WILLIAM: Yeah.

JENNIFER: Okay. I know you're concerned about not providing details about the individual people, and so I'm not gonna-- and this isn't under oath. Like I said, I'm not gonna press that issue.

WILLIAM: So, is that important because--

JENNIFER: Well, the-- I do have another question. Maybe I can ask you that question, and then kind of come back to that to tell you how would-- how it might be important to know the individuals. Based on what you provided to me in writing in your responses, if I understand correctly, there was a small amount of the deposit that came from individual sources outside of your own personal funds. I think it was that very small amount.

WILLIAM: One thousand and fifty dollars.

JENNIFER: Yes, that that's what I have on record as well. And we have a copy of the document that you submitted to the auditor's office when you requested the recount that was signed by yourself and the other individuals.

WILLIAM: Yes.

JENNIFER: So, my question is did that \$1,050 come from those individuals that were on there?

WILLIAM: Yes.

JENNIFER: Okay. So, we already have their names, and so that leads to, you know, I don't need you to confirm any more than that other than generally that those are the individuals that helped contribute.

WILLIAM: Yeah, and actually, the way that worked out is-- You know, I get frustrated working with groups sometimes, but it's like how much more clear do I need to make this of I can't use a check to walk in there and hand them assorted different check. So, the thousand dollars, I think probably there's an early draft where I didn't include that because it was handed to me as a check on the night that I said I need cash. It's like oh, well can we give you the cash tomorrow? It's like no, I don't want cash tomorrow when I walk in there. I want everything all together so that I'm ready to walk in and hand. I don't want to be shuffling cash. 1: Oh, well, can we write you a thousand dollar check for tonight then? It's like, yeah, that's fine because then I'll just deposit it. So, I think in a very early document that I submitted, or a response, or something somewhere along the line, I may not have included that thousand dollars as coming from anywhere else, but anyway, yes, that thousand dollars came in, and then probably the person who could least afford it said okay, I've just got my grocery money and I put it in my envelopes. I have to do this to make sure I've got enough money to make it from one paycheck to the next, but I want to contribute to this, so here's \$50, and handed me \$50 in cash. So, the rest of it was all out of my resources.

JENNIFER: Okay. I appreciate the clarification. You had provided some additional detail during your narrative that hadn't been included, or at least not included in a way that I could pick it out. Let's see. Oh. You had earlier indicated, and you indicated some of this in your written response as well. You talked about being repaid for the funds. And I know that ultimately you didn't end up being repaid, and I understand your reasoning why you didn't want to be paid by individuals who are taking out loans against their credit cards or other kinds of loans where they'd be charged some kind of interest or the money wouldn't stay local, as you had indicated at the beginning of your message, but what did you initially have in mind? Were you thinking that you would give money, and then let people pay you back through the GiveSendGo, or were you thinking that they would pay you directly? What was your-- not what ultimately happened, but what was just your thought of future that--



WILLIAM: I thought-- At the very beginning, the GiveSendGo account was there and I thought that that was a source that would be used to pay for the recount since that's what its purpose was, crowd-sourced funding. And so, that was really all my thought of is that since there's money there, but we don't have access to it logistically right now. I mean, you can't get it in time. My thought was that it would come from there. You know, whatever was able to be repaid would be paid from the crowd-sourced funding. That was my thought at the time.

JENNIFER: Thank you, and I think what I heard from you is that at this point, the auditor's office has not requested any additional funding from you and you are not going to communicate with them as to whether they owe you money for any kind of a refund, and that it sounds like really what happened if I'm doing the math correctly, that all but fifty dollars was really your own fund that you really paid for almost the entirety of the deposit.

WILLIAM: Yeah, I could look at it that way.

JENNIFER: Okay.

WILLIAM: You know, I think the question that you asked at one point was did any other person or entity help pay for the total cost? And that's where I said well, you know, they-- that check for a thousand dollars wouldn't have been written to me. So, maybe that kind of counts towards it, but, you know, the day that I walked in and delivered the money to the auditor, all but \$50 of it had come from me because I hadn't deposited the check yet. And, you know, if you want to split hairs, I had \$50 in my pocket that would have covered the other 50 it hadn't, you know, but I think I did actually use the \$50 bill. So, yes, I did use \$50 from somebody else. You know, and when I was going through early on reading all of the rules, I did stumble across that section of, you know, all you have to do is just say it was all yours and nobody can say any different, but that's not right. It's not what happened.

JENNIFER: Yeah, I appreciate your honesty and I appreciate you explaining the nuances that occurred and the reason why you had initially said, you know, 1,050 versus 50. It makes sense to me now understanding the timing that you were up against and that someone was wanting to give you funds, but had to write a check because they didn't have the cash. And so, I'm gonna come back to some explanation for you by the way.

WILLIAM: Okay.

JENNIFER: So, but I had one more question which was-- And I realize I'm gonna trust you on the pronunciation of the candidate's name because I've been calling him-- we've all been calling him, pronouncing his last name as 'cuss', but you're announcing as 'koos'. So, were you aware before all of this-- Before spending your own funds to pay for the deposit, were you aware of Rick Kuss' assistance with the fundraising effort? He had indicated on several occasions that he was not involved in the group that you ended up being the chairman of, but that other than helping fundraise. Were you aware of that when you were deciding to spend your own money

and paying for the deposit? Was that something that you-- You indicated that you had some communication with him, but I wanted to know if you were aware that he was helping with that fundraising.

WILLIAM: I don't know for sure. Trying to remember. Time's transpired and lots of things, so separating out exactly. I know that the crowd source fundraiser said friends of Rick Kuss. I don't know that I knew, but it wouldn't have surprised me that he was supportive of the effort, and at I don't know the nuances between if you're a candidate and you have a pack, where that nuance comes in of where you've now created a new pack or all of those things. I knew that he was supportive of the effort. I knew that he was aware of the GiveSendGo account. I don't know what-- I don't think I knew what his involvement in the GiveSendGo account was if any. Yeah.

JENNIFER: That's okay if you-- You've told me what you can recall. I just was trying to figure out the origin of the name, first of all, as you said, the friends of--

WILLIAM: Yeah.

JENNIFER: It makes sense that people that are considered to be his friends would be the folks that would be trying to have a recount.

WILLIAM: Yeah.

JENNIFER: Trying to figure out how him being involved in the fundraising, how that played in, and if you don't know that, that's okay.

WILLIAM: It's outside my knowledge. It didn't occur to me until-- This is probably gonna-- Somebody who lives in is gonna say what took you so long. It didn't occur to me until this weekend when I was walking the dogs, I was out there saying I wonder if friends of Rick Kuss is the name of a political action committee? And then, I was gonna look it up and I never did.

JENNIFER: Yeah, it's not a committee that's registered with us because I have looked it up, and it's not the name that he used for his campaign for sheriff, so--

WILLIAM: Okay.

JENNIFER: So, it is a different name. It has his name in it, but it doesn't-- it's not the same.

WILLIAM: Yeah. That's kind of when I went to the meeting. They were, all of us, were supporters of his candidacy, and I wouldn't be surprised if some of them had worked on or with his campaign, but I didn't ask. You know, and again, it's kind of one of those things where, you know, in hindsight, maybe I would ask now, but I didn't then.

JENNIFER: Well, I know that part of this process is you learning how our part of the world

works, and so-- And I suspect that you will continue to be part of our world going forward because we probably have, if nothing else, piqued your interest.

WILLIAM: Yeah. I it was hired onto the elections department staff, so--

JENNIFER: Way to go.

WILLIAM: Next election. And you know, one of their question's like why are you doing this? And I said because I want to look on the inside. I want to watch and see how it's done inside as well as just from an observer perspective.

JENNIFER: Yeah, it is very interesting. So, I want to-- I'm going to stop the recording here in a moment, but before I do that, I wanted to say on this recording that when the commission reviews these facts and makes a determination as to whether or not they agree with the staff's initial recommendation that you register and report as a pack or not, they will make that decision hopefully during that meeting and will give some direction both to you and to staff. If they come back and they say that no, you don't need to register and report as a pack, they will probably have some comments that will go along with whatever decision that they make that will help us, especially staff, to be able to go forward and give additional guidance to future folks like yourself consistent with that decision that the commission makes and we'll be able to dismiss this. So, I will follow up then and do a letter that would dismiss the relegations entirely. If they make a decision that says that you do need to register and report, knowing those individual people's names would become part of that reporting.

WILLIAM: I understand.

JENNIFER: I think it is an important fact that although you didn't entirely fund this recount effort, all but that \$50 was your own funds. And so, that's a very important nuance in the facts that I want the commission to be able to consider so that whatever way they go that that is part of that decision-making process and that whatever guidance they tell staff that we should be able to use in the future hinges upon that kind of nuance because there might be somebody-- What if there's somebody who spends, you know, a hundred dollars or collects a hundred dollars? I mean, is that too much? Is that too little? It depends on the direction the commission goes, and we need that so that we can go forward with this. And so, that is all I wanted to share on the recording. Was there anything else you wanted to have recorded? And again, I'm just-- I want anything that we want to use for the facts. I want to make sure that those are recorded and I just wanted to have that on the record just so that I could kind of wrap up things like I started them.

WILLIAM: Yeah, I think that's-- I've talked more than I usually talk in three weeks now, so-- 1:

JENNIFER: I Understand, yeah. I appreciate you being willing to just talk because I think we did touch on some things that you did not Include in your in your written materials that maybe you would have had we continued to go back and forth, but I appreciate that because I got some

important information that I think will be helpful to explain kind of some of the background.

WILLIAM: So, not sure that this is the recording part or not, but-- So, one of the things that I am aware of-- Aware of isn't really the right word, but I know Dinesh D'Souza ended up getting penalized a huge amount for a campaign contribution that was over a limit somewhere, somehow. I always thought that doesn't seem right. And when I went into this, one of my specific things that I stated, at least to Carla, my wife, is that I don't want to get sideways of any campaign finance laws. I know they're out there, and so, you know, that's why one of the reason-- well probably one of the motivating reasons why I've been adamant that I don't think that this had anything to do with a campaign-- So, I guess it is a concern of mine is that, you know, I contributed probably a lot more than you can contribute to a local sheriff election if this is counted as part of that campaign.

JENNIFER: And you would be correct. This could come out with the commission's discussion. It is not something that I am planning on putting in the information that the Commission is provided because it's a different path. The matter before us and before the commission will be whether you and the folks that helped, in this case, the one other person that helped fund the recount effort met the definition of a political committee that needed to register and report, and then the discussion would be if that's true, then how late is the reporting and what does the reporting need to look like? The matter of whether-- if they decide, you know, that no, you're not a political committee, there could be a discussion about well, does that mean that then this is a contribution to a campaign? It seems, I'm just guessing, but it seems unlikely that they would say no, you're not a political committee, but yet your activity was-- you're not a political committee because this wasn't a candidate, but yet say that it was a contribution to a candidate. That seems really illogical, and the commission tends to be pretty logical with their own thoughts. So, I'm not planning on bringing that to them because it's not part of the complaint.

WILLIAM: Good.

JENNIFER: And if it does come up, as I said, that would be a very unusual, maybe would be the right word, kind of a course of action. But you are correct that there are contribution limits for a sheriff campaign and that your contribution, if it was considered to be a contribution, would be to a campaign, it would be a lot higher than what was allowed.

WILLIAM: Yeah, and just as you were talking, it struck me as ironic that of all of the things-- and if I end up disclosing, it doesn't really matter to me, but the person that handed me the fifty dollars out of the Grocery money said and don't tell my husband that I'm doing this. So, it's gonna turn out to be that's actually the only one.

JENNIFER: Yeah.

WILLIAM: But it's okay. It's water under the bridge. It's fine.

JENNIFER: Yeah.

WILLIAM: And then--

JENNIFER: Go ahead.

WILLIAM: The other-- This isn't the thought that flitted and got lost, but I'm gonna lose this one again if I'm not careful, is that, you know, I said that I can understand an argument for requiring this to be reported at falling under the Public Disclosure Commission's jurisdiction. And just the thought that I had on that is as I've been learning things is that there's a requirement that you can only do two recounts, and it occurred to me that you would want to know if somebody was weaponizing the recount process. You know, and one thing I learned a long time ago is that there are people that have devious thought processes that I can't even begin to comprehend, and they're incredibly creative, but I could see a scenario where if the Elections Department is limited to two recounts, if you just said hey, I'll spend 30 grand two times to end the recount process on whatever it is that's going on, I could see how you could use the recount process-- Well, actually, I can't really see how, but I know that for me, 30 grand is a lot of money. But for a lot-- for people that move in the power circles, I'm fairly certain that 30 grand would be an easy thing to drop in a bucket and say if I can shut down this path of something happening by infesting 30 grand, they could do that. And that would be a reason to see-- to have-- The public would want to know who's funding the recounts. That makes sense.

JENNIFER: Yes, it certainly does. I mean, the there is a reason why disclosure is in our name of our agency, and that's really-- that was really the strongest weight behind our guidance to initially to register a report was in the interest of disclosure, we often will lean towards more reporting rather than less. And so, we do-- I mean, staff did have-- You mentioned that it took a little while for the file assistant specialist to get back to you and that he did bring that to a meeting that involved our compliance staff. I wasn't at that particular meeting, but our compliance staff and then Sean Flynn, our general counsel, and then our executive director, and my direct supervisor, our deputy director. So, it was discussed with the individuals who can make those decisions on behalf of our agency. So, yes. That is all about where we go, so--

WILLIAM: Yep, and so-- And I guess if I ultimately-- I mean, if the decision is I should have registered and filed, you know, I'm fine with that. Registering, I don't really mind. Logistically, a lot of the requirements of creating the bank account, and the treasurer, and all of those kinds of things, I mean, in my mind, it's fairly simple. I mean, I can deliver a verbal report to the commissioners, you know, because I've got a copy. And the only reason I redacted all of the names on the bottom was kind of maybe two reasons. The first was because it ends up being published there. I didn't really want everybody, the public to be able to see it easily. I know that it's public information, and you went and got it, and you know, that's fine. I had no problem with you doing that, and I fully expected you to, and would have been surprised if you hadn't. Now I lost my train of thought again. Oh well.

JENNIFER: We have been discussing this for a long time, so you can rest assured that I'm not thinking that you are not coherent for some other reason other than you've been talking for two hours about business that has happened a long time ago, as you mentioned. So, yeah. I mean, and if the commission determines that yes, you need to register a report, we will give you whatever assistance that you need to get that done. So, that's is our commitment. That is the reason why we have a whole assistance customer service division.

WILLIAM: There's basically two names now. We're talking about mine.

JENNIFER: Yes. W; And all I would need to do is fill in the blank of the you've got a one in five chance of getting it right.

JENNIFER: Exactly. Yeah. It's unfortunate that that person was in a situation where those funds were-- might have been needed, but I also appreciate your ability to see that that person really wanted to be part of the process and wanted to give you what they could. I mean, it was ultimately their decision and I appreciate you honoring that decision.

WILLIAM: Thank you.

JENNIFER: So, if there's nothing else, I'm going to stop the recording, and then I have just a couple more things that don't need to be recorded, and then--

WILLIAM: Okay.

JENNIFER: Get over to the spot where it tells me that I can stop the recording here.

# EXHIBIT 7

**30 November 2022**

To Whom it May Concern,

In accordance with RCW 39A.64.011, the undersigned registered voters in Kitsap County hereby apply for a manual recount of all votes cast in the 2022 General Election for Kitsap County Sheriff. The data we are seeking is only for the gross total, so we are requesting the recount for all precincts

The group has designated William Campbell as chair of the group.

The recount requested is similar to the random batch audit. Our request is to hand count the 124242 ballots to verify the certified results of the election. We understand the total cost will include handling the sealed containers with the ballots while maintaining chain of custody requirements. We have observed the random batch audit and note that two people counted and double checked approximately 400 ballots in 30 minutes.

We also understand that there will be some cost associated with setting up a room with sufficient space for the counting team and observers.

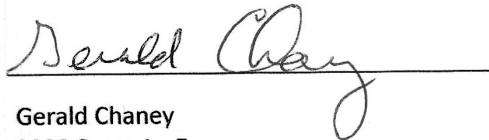
We also understand that there will be some cost associated with sealing each container after the count of that container has been completed.

We acknowledge receipt of an e-mail from Auditor Paul Andrews dated 30 November 2022 explaining that an amended abstract is required to be presented to the canvassing board after the count. We understand that this requirement necessitates sorting the ballots by precinct and that the costs associated with sorting the ballots is part of the requested recount.

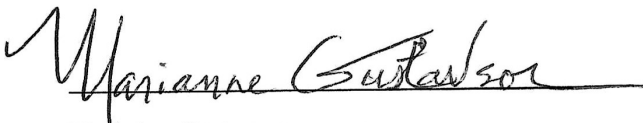
The elections department of the Kitsap County Auditors Office is requested to perform the recount in a space large enough for observers and permission for representatives of both candidates to observe the count.



William B Campbell  
5629 Minard Rd W  
Bremerton, WA 98312



Gerald Chaney  
3939 Sacco Ln E  
Port Orchard, WA 98366




Marianne Gustavson  
3379 Olympiad Dr SE  
Port Orchard, WA 98366



Ron Rice  
369 SW Sedgewick Rd  
Port Orchard, WA 98367



Michael Gustavson  
3379 Olympiad Dr SE  
Port Orchard, WA 98366



Martha A. Mioni  
3141 La Linda Ct SE  
Port Orchard, WA 98366





# View Ad Hoc Bank Transaction

03:18 PM  
05/11/2023  
Page 1 of 2

Ad Hoc Bank Transaction	Ad Hoc Bank Transaction: Treasurer's Main account 12/01/2022
Status	Approved
Ad Hoc Bank Transaction Number	AHBT-00035625

Ad Hoc Bank Transaction Information	
Company	Kitsap County
Display Account Set	Kitsap County Parent Account Set
Bank Account	Treasurer's Main account
Currency	USD
Date	12/01/2022
Memo	\$31060.50 cash deposit for recount 11/8/22
Deposit	Yes

Ad Hoc Bank Transaction Details	
Transaction Amount	31,060.50
Tax Amount	0.00
Purpose	Deposit at Treasurer's Office
Reference	5151
External Reference	
Journal Source	Ad Hoc Bank Transaction

Accounting Options	
Exclude Bank Account Worktag on Lines	Yes
Eliminate Foreign Exchange Gain or Loss	No

## Ad Hoc Bank Transaction Lines

Company	Revenue/Spend Category	Ledger Account	Amount	Tax	Tax Point Date Type	Tax Point Date	Memo	Program	Cost Center	Fund	Additional Worktags
Kitsap County	3410.45 - Election Services	3400:Charges for Services	31,060.50	Tax Applicability Tax Code			\$31060.50 cash deposit for recount 11/8/22	5151 - Elections - Services	Auditor	FD00515 Elections	BARS Function: Other Centralized Services (PRG: 5143, 5151, 5152) Business Unit: General Government

## Reconciliation Information





View Ad Hoc Bank Transaction

03:18 PM  
05/11/2023  
Page 2 of 2

Bank Statement	Bank Statement Line	Reconciliation Status	Reconciled By	Reconcile Date
Treasurer's Main account: 12/05/2022	12/05/2022 \$31,060.50 301 Commercial Deposit	Reconciled	system	12/06/2022 04:30 AM

Business Process

Process	Step	Status	Completed On	Due Date	Person (Up to 5)	All Persons	Comment
Ad Hoc Bank Transaction Event	Ad Hoc Bank Transaction Event	Step Completed	12/01/2022 10:55:34 AM	12/02/2022	Amy Epperly (431939)	1	
Ad Hoc Bank Transaction Event	To Do: Initiate Wire	Not Required		12/02/2022		0	
Ad Hoc Bank Transaction Event	Review Ad Hoc Bank Transaction	Not Required		12/02/2022		0	
Ad Hoc Bank Transaction Event	Review Ad Hoc Bank Transaction	Not Required		12/02/2022		0	
Ad Hoc Bank Transaction Event	Review Ad Hoc Bank Transaction	Approved	12/01/2022 10:57:19 AM	12/02/2022	Athena Dillon (418140) (Cash Analyst)	1	

# EXHIBIT 8

**Regarding the funds used to pay for the recount:**

- 1. What was the total cost?**
- 2. How much did you spend of your own funds towards the total?**
- 3. Were you reimbursed or refunded any of your funds? If yes, how much of your total cost was refunded?**
- 4. Did any other person or entity help pay for the total cost? If yes, how much of the total cost was paid for by others?**
- 5. If others contributed to the total cost, were they reimburse or refunded for those funds? If yes, how much was refunded?**

1. I have not received a bill from the county nor has any of the deposit been refunded by the county. Therefore, the deposit of \$31060.50 submitted with the recount request is the total cost.
2. My personal funds provided \$30010.50 of the deposit.
3. I have not received any reimbursement or refund of my funds.
4. No entity helped with the deposit. Three other people from the group of 6 registered voters provided funds for the deposit.
5. None of the funds the three people contributed to the deposit have been reimbursed or refunded.

# EXHIBIT 9

**Interview W Campbell \_115649-20240214\_125118-Meeting Recording**

**PDC CASE 115649**

>> Jennifer Hansen: Make sure it's working. It is! So this mic here is picking up very nicely even as quiet as I'm talking right now. So. Just want to make sure that the cameras are not on. They are not. Look, the little eyes--

>> William Brian Campbell: That's how they do that.

>> Jennifer Hansen: Yeah, the little eyes are--

>> William Brian Campbell: I see them switching back and forth. During meetings, you know, I see the one up there. That's how they do that. Yeah, switching back and forth.

>> Jennifer Hansen: Yeah--

>> William Brian Campbell: During meetings. You know, I see the one up there. But...

>> Jennifer Hansen: Yeah. Before--

>> William Brain Campbell: I didn't know how these get, these directions.

>> Jennifer Hansen: Yeah.

>> William Brian Campbell: Now I do.

>> Jennifer Hansen: Yeah. There you go. Now, you know. Okay. Thank you. And I do have some copies of things that you and I have shared. So, documents that you've sent and responses. Other things that, that you and I have talked about via writing, so. okay. All right.

>> William Brian Campbell: I probably will need to refer to them. It's been a long time.

>> Jennifer Hansen: It has been. It has been a long time. Okay. So, so I started the recording here. So this is Jennifer Hansen. Compliance officer with the public disclosure commission. It is Wednesday, February 14th, 2024. The time is 12:52 p.m. I am here at the PDC offices in Olympia. With me is, William Campbell who also goes by Brian. I indicate that because of the correspondence sometimes as Brian rather than William. And then, Mr. Campbell's wife who will identify herself in a moment here. Who has appeared per staff subpoena. Dated January 31st, 2024, to discuss PDC case 115649. So this interview as I said is being recorded. For the records, Mr. Campbell, please confirm that you're aware that your statements and responses are being recorded.

>> William Brian Campbell: I am aware this is being recorded.

>> Jennifer Hansen: Excellent. And then please state your name and address for the record

>> William Brian Campbell: William Brian Campbell. 5629 Minard. M-I-N-A-R-D Road West in Bremerton, Washington.

>> Jennifer Hansen: Excellent And then I'll go ahead and swear you in first. Do you swear or affirm that the statements that you make and the answers you provide to me during this interview today will be truthful.

>> William Brian Campbell: Yes, I do.

>> Jennifer Hansen: And then this Mrs. Campbell, are you aware that this is being recorded?

>> Carla Campbell: Yes. I am aware.

>> Jennifer Hansen: And for the record, would you give your name? And then either give the same address or indicate that you live at the same address?

>> Carla Campbell: My name is Carla Campbell. And I live at the same address as Brian. William Brian. Yeah.

>> Jennifer Hansen: Excellent and then in case you want to make any statements today. Do you use word firm that the statements you will make and the answers you'll provide to me during this interview today will be truthful.

>> Carla Campbell: Yes.

>> Jennifer Hansen: Thank you very much. So Mr. Campbell. If you would, please explain your primary role in the recount effort of the 2022 Kitsap County Sheriff's race.

>> William Brian Campbell: Primary role is I was chairman of the group of six registered voters that, requested the recount.

>> Jennifer Hansen: Had you been involved in a recount before?

>> William Brian Campbell: No.

>> Jennifer Hansen: So why were you interested in this particular recount or this race in particular?

>> William Brian Campbell: This recount was, it looked like an opportunity to check the machine count against a hand count. And not have to-- it limited the variables in a recount. So I became aware of the other people interested in doing a recount. And--so. What was the question again? I lost it.

>> Jennifer Hansen: Why this recount was of interest to you?

>> William Brian Campbell: Why this recount? And then in looking at this recount, there had



been a random batch audit. That had been done by the Elections Department. The random batch audit had a different result in final outcome of the election. And so, it seemed odd to me that that would be the case. That a random batch sample--would be so markedly different from the final outcome. This was also an election that was limited to a single elections Department in a single County with a single tabulator. So, if you could check the machines, you can't go look at the code to see what's in the machine. So it would be a way to verify whether or not the machine's counted what the tabulators came up with the same count that the actual folks had.

>> Jennifer Hansen: The records that you provided to me and records that I've received independently, tell me the date that you submitted the, the recount request was submitted. As December 1st, 2022. Does that sound correct to you?

>> William Brian Campbell: That sounds correct. I know it was within-- I think 48 hours after the end of the-- after the certification of the election.

>> Jennifer Hansen: So did you personally submit the request for the recount to the Kitsap County Auditor's office?

>> William Brian Campbell: Yes, I did.

>> Jennifer Hansen: What did that entail? Do you remember?

>> William Brian Campbell: Submitting the quest entailed preparing the quest and then there is the based on the number of ballots that are counted. That is required, it's a deposit to cover the cost of the recount. And I provided the request to the auditor along with the money.

>> Jennifer Hansen: Did you receive anything back from them? Any confirmation about the...

>> William Brian Campbell: I received a receipt that, that said they received-- However much it was. It's in the documentation. 30,000 ballpark, a shade over.

>> Jennifer Hansen: No--the records that I have. Again, that I've obtained independently and that you've also provided. Indicates that the cost was \$31,060.50.

>> William Brian Campbell: That seems right.

>> Jennifer Hansen: What form of payment did you use to pay that?

>> William Brain Campbell: Cash.

>> Jennifer Hansen: And will you tell me why you used cash?

>> William Brian Campbell: The requirement is that it has to be a certified check, or cash. And then I started trying to figure out what a certified check was, and I know how to get a cashier's check. And then there's discussion about whether a cashier's check and a certified check is the same. I wanted to get it right, so I did cash.

>> Jennifer Hansen: And so, the receipt that you received was for the cash payment that you--

>> William Brian Campbell: Right.

>> Jennifer Hansen: At any time prior to that date, December 1st, 2022, when you submitted that payment; did you request monetary assistance from anyone else?

>> William Brian Campbell: The-- in the-- lead up to that. Yes, the group of six people. I said that we need to come up with the cash. Because we have 48 hours to do it. And so, it's going to be up to the six of us to go do that. So yes.

>> Jennifer Hansen: Just to clarify on the timeline. Did you--was the day that that 48-hour window... Was that the first time that you were discussing payment?

>> William Brian Campbell: It was right in that time frame. I don't know exactly, I know that--

There was a group of people that were doing online crowdsourcing type fundraising, that says 'we'd like to fund a recount'. So I was aware of that. And when the six of us were meeting we thought that what we were doing would satisfy the intent of that. And so we thought that might be a source of funding, it turns out that it is not. Because you have 48 hours, and it takes longer than that to pull the money out that people are crowdsourced in. So that's why it was up to us to come up with the money in that amount of time. I don't remember exact dates. I mean, that's fuzzy it was-- It was being certified, right after Thanksgiving. If I remember correctly. So it would have been-- I don't remember the exact. I don't remember if it's within the 48 hours, but it's within a few days of that I-- sorry. I don't remember. I think it's in the first statement I sent some specific dates of when I got together with--

>> Jennifer Hansen: Yeah, yes. Yes, you did provide some. So thank you for--

>> William Brain Campbell: So whatever I wrote then, is when it was.

>> Jennifer Hansen: Okay, great. Thank you. And for the record I want to confirm that the crowdsourcing that you were talking about is the GiveSendGo account that was set up.

>> William Brian Campbell: Yes it said, 'Friends of Rick Kuss' or something like that at the start of it.

>> Jennifer Hansen: That's-- that is what the records say, have been provided show as well. So, you have already answered the question about whether you asked for funds. Did you actually receive any money from anyone?

>> William Brian Campbell: The money that I received was-- there was a check that was given to me. The night before we needed it, which was basically useless to me because I had to convert it to cash. So I had a check for \$1,000 from the group and somebody in the group gave me \$50. There was also \$10,000 in cash from the group that I found out later within the next day or so, it was obtained by borrowing from a credit card. I don't like credit cards, first of all. And then to borrow-- to go do that is the worst thing in my mind. So I just returned that money and said I'll

cover the \$10,000 as well.

>> Jennifer Hansen: So if I'm following correctly, you received money in the form of a check, and it was \$1,000 in a check.

>> William Brian Campbell: Yes.

>> Jennifer Hansen: Which indicated it was useless because you wanted to use cash for the--

>> William Brian Campbell: Right. I had to have the cash in hand the next morning.

>> Jennifer Hansen: And then the \$10,000 was also given to you but--or provided to you to use. But when you figured out that you were--that it has been borrowed against to credit card, you returned it.

>> William Brian Campbell: Yes.

>> Jennifer Hansen: And then there were some additional funds. And you said that there were some other funds there.

>> William Brian Campbell: There was \$50 from another person in that group.

>> Jennifer Hansen: Was the \$50 cash.

>> William Brian Campbell: Yes.

>> Jennifer Hansen: Did you, besides the \$10,000 dollars that you've already indicated. Did you return the other money, which was the \$1,000 check, was it returned?

>> William Brian Campbell: No, I cashed it--

>> Jennifer Hansen: The 1,000.

>> William Brian Campbell: Yes, okay.

>> Jennifer Hansen: Do you remember later so--

>> William Brian Campbell: So, functionally reimbursed. Yes.

>> Jennifer Hansen: Okay. And when you say functionally reimbursed are you talking about yourself--

>> William Brian Campbell: Yes.

>> Jennifer Hansen: For that one?

>> William Brian Campbell: Right. Yeah, so that \$1,000 would have come out of my personal reserves. On the morning that we paid the money to the auditor. But then I cashed the check in the next day or 2. So that money came back to me.

>> Jennifer Hansen: Did you return the \$50 cash that was given?

>> William Brian Campbell: No.

>> Jennifer Hansen: So, so just to clarify \$10,000 is the only amount that was given to you or offered to you that you did not accept.

>> William Brian Campbell: Correct.

>> Jennifer Hansen: So that \$10,000 was the reason for that was because it had been borrowed on a credit card and you feel strongly about credit cards. And you indicated that the \$1,000 check was --you cashed it after you submitted the refund. Request along with the cash payment.

>> William Brian Campbell: Correct.

>> Jennifer Hansen: Thank you for bearing with me while I make sure that for the record, we have all the details. I don't want to misunderstand something and not get it right the first time. Do you know the identities of the people who gave you the \$1,000 that \$50? Who are those people?

>> William Brian Campbell: So I'm not sure that they've given me permission to tell you that. And I don't know what the legal implications of that is.

>> Jennifer Hansen: I needed to ask the question so...Was, the was the people who gave you the \$1,000 or the \$50 cash. Was it Michael Oher Marianne Gusterson?

>> William Brian Campbell: Yes.

>> Jennifer Hansen: I spoke to them independently. So that's where I got their names.

>> William Brian Campbell: You had access to it all so. And I've given you enough clues so that you probably know the other one too.

>> Jennifer Hansen: So, You alluded to it a little bit. But if you would go into a little bit more detail as to why you're unwilling to provide the identities of the person who gave you the \$1,000.

>> William Brian Campbell: The \$1,000? Just-- I don't-- Part of the whole thing is the-- is whether I'm required to file the whatever reports they are. Which has that information in it, so. It just seems like--if the Commissioners decide that I'm required to file the report, you'll get the information. I mean I have to fill out the report and that's where it would be. Doesn't really matter.

>> Jennifer Hansen: Okay, thank you.

>> William Brian Campbell: And the other person is--You probably have deduced who that is too, by these pronouns and things.

>> Jennifer Hansen: Thank you very much. So if you would explain the circumstances that led you to use personal funds to pay for the majority of the recount cost. So all but \$1000 that was used like-- that was refunded to you later. And then the \$50 that was given to you. So if you want to explain why you used personal funds for the rest.

>> William Brian Campbell: Well, we had to have enough to pay for the recount within the 48 hours. So it had to come from somewhere. I had it so I was willing to use it. The-- I guess. You know, this is one of the things that--not something I don't normally do. So I wake up in the middle of the night thinking about where is this going? What have I done? And then, you know, it's spending time with the Lord talking and saying what do you have for me in this? Why are you asking me to do this? And it was just a conviction that I felt in that time that said, you know, this is not your money. It's my money that I've given you to be the steward of. And so, at that point I had a piece of like, oh, well, that's what this money is for. And so, I at that point said I don't need anything returned. I'm not looking for you. That's where the personal funds came from. And I told Carla about it the next day. And said here's what I think that we should do, and she said I'm all for it. So. At that point we said we're not looking for any money back.

>> Jennifer Hansen: To loop back around to the not looking for any money back. The-- you weren't expecting to receive any funds from other individuals that were part of the committee. Part of the group, not committee, part of the group. The recount group, you weren't expecting to receive money from them.

>> William Brian Campbell: Correct. Not after that point. I mean there was you know-- this kind of-- have a desire. I'd rather not spend my money on a recount personally. But when it became clear that that's where the Lord intended for that money to go then. I had no requests. And there was never any discussion of anybody giving me any of the money. Other than there was some nebulous talk about maybe it'll come from the GiveSendGo Account. And then once-- I can't remember the dates where this all happened. But it was within that first week. It was before the

recount started. That in my mind, the financing of it was settled. Is that it was just going to be primarily me and then like the \$50 that was given to me. She said, you know, don't tell my husband. Which is part of the reason was because she just gotten paid. And she took it out of her grocery money stash for that day. And said, you know, I want to support this and so I took it. You know reading the rules later. I would probably have said you know, why don't you all just let me cover this one? Not taken anything because then all of this would have been a non-issue, but I didn't know the rules at the time. So here we are. And I don't know why the Lord is taking us through this. And we'll find out and we may never find out. See where we end up.

>> Jennifer Hansen: You've indicated a couple times that this was money that was-- that was not intended for this purpose. But it you ended up spending it on the recount. Do you want to-- Do you want to elaborate at all on what it was that you were using--planning on using this money for?

>> William Brian Campbell: I was planning to buy a tractor. [laughing]

>> Jennifer Hansen: Yeah, did you end up buying the tractor in some other way.

>> William Brian Campbell: I did.

>> Jennifer Hansen: I want to shift gears here a little bit. What was your relationship with the 2022 Kitsap County Sheriff Rick Kuss?

>> William Brian Campbell: Not really any of a relationship. I went to two of his campaign events and listened to him talk. And I gave a contribution of an arbitrary amount. It was in the ballpark of \$500 if I remember right. And so, in order for me to keep track instead of doing everything in unique numbers, I put an addition on the end of it, so I know that it was, in fact, what I intended to do for a specific thing. Otherwise, you get your bank statement that says, you know, \$500 [indiscernible] \$500. I don't know which one went to where. Trying to reconcile it. So, I tacked on some-- I'm sure you have it in your records. It's I think it had a 5 on the end of it, but I don't remember because that's--



>> Jennifer Hansen: \$552.

>> William Brian Campbell: Okay. Okay.

>> Jennifer Hansen: Just for all of our satisfactions.

>> William Brian Campbell: Yes. Yep.

>> Jennifer Hansen: That's for the Rick Kuss [indiscernible] reported, so. On September 18th, 2022. Did you discuss the recount effort with him?

>> William Brian Campbell: When I met him in the--canvassing board--meeting there was a canvas in board meeting. And I met him there and I asked him if he was in favor of doing a recount. He said he was so. To that extent. Yes, I did discuss with him a little bit.

>> Jennifer Hansen: When you had that discussion with him about whether he was in favor of it, was it, particular to his-- The race that he had been in. Was he-- did you get into those specifics about--

>> William Brian Campbell: He was-- I presume interested because of the race that he was in. I'm interested because I don't trust the machines or better phrased is that there is a question about whether the machines were counting accurately. And I wanted some data to be able to move the discussion forward. Rather than everybody saying, I think the machines are doing this, that or the other thing. It's like well, let's do something where we can find out. And quit arguing about that element of these.

>> Jennifer Hansen: You had indicated in your written materials to me the-- what occurred with the GiveSendGo account. Would you-- recount what you can recall about that. What happened to the money that was in there?

>> William Brian Campbell: My understanding, what I've heard from a friend. Is that it was returned. Because the money that she had contributed to it was returned to her.

>> Jennifer Hansen: So one of the, one of the individuals who you spoke to, who was a donor to that. Ended up with their money being returned. So you assumed that everyone else--

>> William Brian Campbell: I presume that because the gifts in call account went to zero rapidly. I was not involved in it. Again, I don't even know how it works to know how it gets distributed or returned.

>> Jennifer Hansen: And, also in your written materials you had spoken a little bit about-- that that was something that drew you in to the recount effort? Can you speak to that a little bit?

>> William Brian Campbell: Again because it's-- Because there was discussion of a recount. That's what drew me in to where it's like, 'Oh if somebody wants to go do this, I think that'd be awesome. I would like to contribute to that.' So-- but then GiveSendGo is a contribution of a credit card. So I didn't really want to do it that way.

>> Jennifer Hansen: Again, just to clarify you didn't want to do that because of your feelings about using credit cards.

>> William Brian Campbell: Correct.

>> Jennifer Hansen: I don't think I have any other questions. I wanted to give both of your individual opportunity to tell me anything else that you would like to say on the record. Any other points that you think need to be recorded? Any other facts, reasons, statements, anything that you'd like to say? That you want to--

>> William Brian Campbell: I don't have anything off hand. I mean, it's one of these things that it's a year ago now. [laughing]

>> Carla Campbell: Yeah.

>> William Brian Campbell: Vague recollection. I mean not vague, but you know, I don't have precise recollections of dates. But you have those documented, whatever I wrote was truthful when I wrote it. So, it's still-- that's the best record.

>> Jennifer Hansen: Carla, did you have anything that you wanted that--

>> Carla Campbell: I don't. Thank you. [Indiscernible]

>> Jennifer Hansen: Alright. Well, I am going to stop the recording her. It is 1:18 p.m. On Wednesday, February 14th, 2024. And this concludes the interview with William Campbell and Carla Campbell regarding PDC case 115649.

**[End of transcript]**

# EXHIBIT 10

MARIANNE D. GUSTAVSON  
MICHAEL A. GUSTAVSON

2410

68-7497/2560

11/30/2022

DATE

PAY TO THE  
ORDER OF

William B Campbell  
One Thousand and no/100

\$ 1000<sup>00</sup>

DOLLARS



NAVY  
FEDERAL  
Credit Union

FOR

*Michael A. Gustavson*

256074974 2410

TRANSIT ROUTING NUMBER

CHECK NUMBER

ACCOUNT NUMBER

256074974

2410

MARIANNE D. GUSTAVSON

Security Features exceed industry standards and include:

- ImageMatch®: Matching account and check number on back (Patent No. 9,240,085)
- MobileMark®: Mobile Deposit check mark to indicate check has been deposited via mobile device
- The Security Weave®: pattern on back designed to deter fraud
- Microprint (MP) lines printed on front and back
- The words "ORIGINAL DOCUMENT" across the back
- Photo Safe Deposit® icon visible on front and back

Do not cash if:

- Any of the features listed above are missing or appear altered
- Fugitive ink on back looks pink or has disappeared
- Brown stains or colored spots appear on both front and back



☐ CHECK BOX FOR MOBILE/REMOTE DEPOSIT  
WRITE NAME OF FINANCIAL INSTITUTION ON LINE A

For *William B Campbell*  
*Mobile Deposit only*

*William B Campbell*

# EXHIBIT 11

[Marthamioni](#) replied

*Mon, 10 Jun 2024 at 4:56 PM*

To:"PDC Support" <pdcc@pdc.wa.gov>, "Martha Mioni" <marthamioni@msn.com>

External Email

Dear PDC:

This email is a statement for the PDC Compliance Officer, Jennifer Hansen, to use in the investigation for the complaint filed against Brian Campbell.

On the evening of November 30, 2022, there was a meeting at Jessica Rice's residence with those interested in helping out with the hand recount of the Kitsap County Sheriff election. Brian Campbell was also in attendance.

The hand count was to be an expensive endeavor. Mr. Campbell was paying for the recount along with donations from individuals. After the meeting I handed Brian \$50.00 in cash. I told him the \$50.00 was to help cover the cost for the hand recount.

Sincerely,

Martha (Marty) Mioni

3141 La Linda Ct SE

Port Orchard, WA 98366

360-876-1456