

<b>Respondent Names</b>
Avrum (Alex) Tsimerman
<b>Complainant Name</b>
Joe Kunzler
<b>Complaint Description</b>
<p>Joe Kunzler</p> <p>Fri, 28 Apr 2023 at 1:06 AM</p> <p>The full complaint is attached but basically all the deadlines Tsimerman missed in 2022 for a C-3 and C-4 being Tsimerman did not declare his candidacy on time and request mini reporting. This behavior was substantial, malicious noncompliance with RCWs 42.17A.235 plus 42.17A.240.</p> <p>As I repeatedly stressed during case #120879, Tsimerman's behavior is malicious, prolific and repetitive. I believe the only thing that is going to get Tsimerman to comply is RCW 42.17A.755(4) invocation.</p>
<b>What impact does the alleged violation(s) have on the public?</b>
<p>Alex Tsimerman's failure to file C-3s and C-4s for at least 2022 and 2023 is ALSO a violation of campaign finance law. This is Tsimerman hiding for instance paying for his website and potentially other campaign activity.</p> <p>Also how many times will Mr. Avrum (Alex) Tsimerman be allowed to violate campaign finance law, hurl hate and pave a path of making the PDC irrelevant? Because I have to say that as a layman dreaming of running for office, I sure see Avrum (Alex) Tsimerman as a case study to point to show that I don't need to comply with the PDC. I can just ignore them and nothing will happen to me. Is that the conclusion you want folks to draw?</p>
<b>List of attached evidence or contact information where evidence may be found</b>
PDC website that doesn't have Tsimerman's C-3s & C-4s.
<b>List of potential witnesses with contact information to reach them</b>
Avrum (Alex) Tsimerman
<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.

28 April 2023

Public Disclosure Commission  
711 Capitol Way S. #206  
P.O. Box 40908  
Olympia, WA 98504

Dear Public Disclosure Commission (PDC) and PDC Staff;

Yesterday, to my gratitude, the Commission found that Alex Tsimerman is a candidate in the 2023 election cycle and has been since at least January 3, 2023 as per Case 120879's Notice of Administrative Charges. Surprisingly no one has mentioned Tsimerman's need to file C-3 and C-4 Contribution Reports yet, so I am noting that Tsimerman has kept his website [alexforamerica.com](http://alexforamerica.com) with an active link to 2023 – Candidate for King County, Bellevue.

I agree with your attorney Susie Giles-Klein that Tsimerman's misconduct is as follows:

It's also an aggravating factor, that Mr. Tsimerman's repeated violations of PDC laws and rules appears to be intentional, and they are ongoing, and he has made no attempt to come into compliance. Then finally, it's an aggravating factor that Mr. Tsimerman has displayed bad faith by repeatedly ignoring PDC staff's attempts at outreach, including his failure to respond or participate in this proceeding as well as the two prior proceedings for the commission.

One would expect with this complaint a similar response. One would hope that Tsimerman this time would be criminally prosecuted if my interpretation of the law is correct.

## **FAILURE TO FILE C-3 CASH RECEIPTS + C-4 RECEIPTS & EXPENDITURE SUMMARY FOR 2022 AND 2023**

Alex Tsimerman has now been found in cases 109529 and 120879 to conduct campaigns and did not file for "mini reporting," as was only available when filing his C-1 form *on time*. Since Tsimerman started his announcement tour on January 3, 2023 – Tsimerman has missed at least these 2023 deadlines as per the PDC website:

January 10      File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Dec. 31

February 10      File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Jan. 31

March 10      File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through Feb. 28

April 10      File a C-3 for each deposit made in the previous month and a C-4 report that covers the period through March 31

Not to mention all the deadlines Tsimerman missed in 2022 for a C-3 and C-4 being Tsimerman did not declare his candidacy on time and request mini reporting. This behavior was substantial, malicious noncompliance with RCWs [42.17A.235](#) plus [42.17A.240](#) – and in particular 42.17A.235 with my emphasis:

(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.

## **PLEASE INVOKE RCW 42.17A.755(4)**

As I repeatedly stressed during case #120879, Tsimerman's behavior is malicious, prolific and repetitive. I believe the only thing that is going to get Tsimerman to comply is RCW 42.17A.755(4) invocation. To quote your Chair Fred Jarrett as he told TVW back in March:

Most of the court cases now that we're seeing are ones that are being initiated by the PDC, for reasons that we just can't get compliance. ... The Attorney General picks that up and they have done an outstanding job of supporting compliance litigation.

How many times will Mr. Avrum (Alex) Tsimerman be allowed to violate campaign finance law, hurl hate and pave a path of making the PDC irrelevant? Because I have to say that as a layman dreaming of running for office, I sure see Avrum (Alex) Tsimerman as a case study to point to show that I don't need to comply with the PDC. I can just ignore them and nothing will happen to me. Is *that* the conclusion you want folks to draw?

Also, I want to know at least two things:

- 1) How is Alex Tsimerman paying for his campaign website?
- 2) Does Alex Tsimerman actually live in Bellevue/King County Council District Six considering the years he's run for Seattle offices?

Without the proper forms, Tsimerman is keeping the public out of the loop.

*We are all that is left of campaign finance transparency.* It's up to us to maintain the integrity of the system, but especially the Commissioners. This complaint is a second chance for the Commission to invoke RCW 42.17A.755(4) and get Alex Tsimerman to a court of law so the message is clear: Blow off the PDC is the Washington State equivalent of, "Tuck Around and Find Out"!

Very respectfully;

A handwritten signature in black ink, appearing to read "Joe A. Kunzler". The signature is fluid and cursive, with a small "id" or similar mark at the bottom left of the signature.

Joe A. Kunzler  
[growlernoise@gmail.com](mailto:growlernoise@gmail.com)