

<b>Respondent Names</b>
Betsy Wilkerson
<b>Complainant Name</b>
Glen Morgan
<b>Complaint Description</b>
<p>Glen Morgan</p> <p>Tue, 16 May 2023 at 2:02 AM</p> <p>To whom it may concern,</p> <p>It has recently come to my attention that Spokane City Councilperson Betsy Wilkerson has committed various violations of Washington State's campaign finance laws (RCW 42.17A). The violations are detailed below.</p> <p>1. Failure to accurately report income/contribution data with the PDC. Possible concealment of true source of campaign funds? (Violation of RCW 42.17A.235, .240)</p> <p>Spokane City Councilperson Betsy Wilkerson was initially elected to the Spokane City Council in 2021. In 2023, she has filed to run for a different office – the position of Spokane City Council President in 2023. She has no surplus funds accounts reported to the PDC for either campaign.</p> <p>This complaint initially involves a mystery \$3,254.89 that appears on the first C-4 filed by the Wilkerson for Spokane City Council President 2023 campaign dated 4/10/2023 (See C-4 PDC Report # 110142065 attached). Since this was the first C-4 filed by this candidate for this office, there is no previous C-4 from which these funds could have appeared, nor is the source of these initial funds clarified in any C-3 report.</p> <p>It is distantly possible that this campaign in some way illegal transferred funds from the previous 2021 Wilkerson for City Council campaign without obtaining permission from the previous donors as required by law, however, even if they illegally did this (which would be a violation of RCW 42.17A.490), that long-expired campaign's last C4 only reported \$2,766.89 according to their last C4 (See C4 PDC Report # 110139387 attached). Please note there is no filing by this campaign indicating that these funds have been transferred to the new campaign for a new office, and even if they mysteriously try to go back and correct this legal defect, the amount doesn't match. Somehow \$488 appeared mysteriously in this bank account (assuming anything filed by this campaign is accurate, of course).</p> <p>I'm giving this campaign the benefit of the doubt, of course (usually a mistake), and presuming that they simply chose to violated RCW 42.17A.490, and the mystery funds are the illegal part of this aspect of the campaign, but who the heck knows for sure? One or both reports are false and provide false information to the public, and regardless, while money doesn't usually grow on trees, it has been known to mysteriously and conveniently appear in</p>

campaign bank accounts from time to time. The Wilkerson campaign appears to be demonstrating an example of this phenomenon right now.

Which leads to the next obvious legal violation by this crew...

2. Illegal contribution from one candidate political campaign to another political campaign without written authorization from original donors (Violation of RCW 42.17A.490)

Again, as I already detailed above, presuming these funds didn't just appear out of thin air, this seems to be the best case apparent legal violation here, although this still doesn't account for the additional mystery cash that appeared in the 2023 political campaign for Spokane City Council President

3. Illegal transfer of funds to another political campaign / failure to accurately report true expenses, misuse of funds for "charity" contribution to political party (Violation of RCW 42.17A.445(2), RCW 42.17A.430(8), RCW 42.17A.240)

Weirdly enough, it appears that the Betsy Wilkerson 2021 campaign had a lot of unusual and illegal expenditures, which somehow escaped my notice that year. I'll attempt to make up for my historic lapse in diligence on this campaign now.

For example, on September 16, 2022 as reported by the Wilkerson campaign, they appear to have made an illegal contribution of \$1,000 to the Spokane County Central Committee, calling it "charity." (See PDC Report # 110130691 attached). As PDC staff know very well, it is illegal for the Wilkerson campaign to kick extra cash to the Spokane County Democratic Party right in the middle of a political campaign and call it "charity" (See RCW 42.17A.445(2)). Of course, this also means the Wilkerson campaign violated RCW 42.17A.240 in the first place by failing to accurately or honestly report expenditures. The proper thing, assuming this money actually was used to pay for a legitimate expense of some kind would be to report the true cost of the expenditure only and have a receipt for the same. Clearly, this did not happen in this instance. As a matter of courtesy, I will attach a complaint (based on a Citizen Action Notice I filed at the time) filed by the Washington State Attorney General on a very similar violation made by failed Thurston County Commissioner candidate Jim Cooper to the Thurston County Democratic Party in 2016. This is just a courtesy reference.

Keep in mind, if the intention was to transfer funds from the Wilkerson campaign to the Spokane County Democratic Party, then the Wilkerson campaign would have been required to create a Surplus Account (which, they did not do), and after the campaign, they could have used some surplus funds for contributions to bona fide political parties at that time. However, this contribution is illegal, failed to meet this standard (See RCW 42.17A.430(8) – as it applies to non-surplus funds).

4. Failure to accurately describe expense, and the illegal concealment of required information from the public. (Violation of RCW 42.17A.240(6), RCW 42.17A.235 & WAC 390-16-037, WAC 390-16-205)

This campaign has also regularly failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures. Here are some examples that need to be corrected by this campaign and the politician who controls it to at least go through the motions of complying with the statute: On the campaign's C4 (see PDC Tracking #110036407 attached) dated July 27, 2021 (amended) the campaign reported expenditures of \$258 for "ads" from vendor "Inlander" but failed to legally detail how many ads, when they ran, etc which is clearly required and defined in WAC 390-16-037 (Example A), a clear violation of the law. On another C4 (PDC Tracking #110065049 see attached) dated December 10, 2021, the campaign reported expenses of \$1,399.56 (on October 29, 2021) for "Invoice #49798" to vendor "Lawton Printing" and once again, this campaign failed to legally provide the details as required by WAC 390-16-037 (Example B, most likely depending on what the actual expenditure is). On the same C4, there was another example of \$8,000 to vendor "EFFECTV" for nebulous and undefined "ads" entirely lacking the details as required under the law. These are clear examples of a failure to provide sufficient detail of expenditures (unambiguous violations of RCW 42.17A.240(6) and WAC 390-16-037 (see example B provided at WAC 390-16-037(3)).

Based on the slipshod reporting, the apparent effort to conceal source of campaign funding, the illegal transfer of funds to outside political parties, and other violations - the obvious failures by the Wilkerson campaign to even marginally comply with Washington State campaign finance laws, it appears extremely likely that this campaign has other problems which would be revealed if the PDC looked a bit closer.

Let me know if you need any additional information.

Best Regards,

Glen Morgan

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

The public has a right to know if politicians only lie to them when they are in office, or if they also tend to lie about other things like their abuse of the state's campaign finance laws. We can't prevent the corruption, but we can expose it.

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

Everything referenced within the body of the complaint (C4s, etc) are attached as exhibits. Keep in mind, the Jim Cooper lawsuit filed by the Washington State Attorney General's office is just an example of one of the similar violations committed by this candidate that has been prosecuted by the AG's office before. Just for one of these types of violations.

<b>List of potential witnesses with contact information to reach them</b>
The candidate, the treasurer, and probably some of the vendors - it would also be wise and prudent to obtain copies of the campaign's bank accounts to reconcile the missing, and/or secret slush fund payouts that mysteriously appeared in this campaign account.
<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.





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

**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

BETSY L WILKERSON (Betsy Wilkerson)  
People for Betsy Wilkerson -  
PO Box 9673  
Spokane, WA 99209  
CITY COUNCIL PRESIDENT  
CITY OF SPOKANE

Coverage: 03/01/2023 to 03/31/2023  
Final report: No  
Report number: 110142065  
Election year: 2023  
Date submitted: 04/10/2023

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$3,254.89
2. Cash received (Schedule A line 1).	\$24,370.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$24,370.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$27,624.89
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$5,928.16	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$5,928.16
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$5,928.16

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$21,696.73
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$21,696.73

Candidate name

BETSY L WILKERSON (Betsy Wilkerson)

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Riley Smith - 04/10/2023

## Schedule A: Cash Receipts and Expenditure Detail

### 1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
03/03/2023	\$25.00	03/16/2023	\$1,890.00	03/24/2023	\$1,150.00
03/08/2023	\$5.00	03/17/2023	\$425.00	03/25/2023	\$2,000.00
03/09/2023	\$2,500.00	03/20/2023	\$650.00	03/25/2023	\$6,925.00
03/13/2023	\$250.00	03/21/2023	\$10.00	03/27/2023	\$100.00
03/14/2023	\$3,720.00	03/22/2023	\$325.00	03/29/2023	\$685.00
03/15/2023	\$640.00	03/23/2023	\$800.00		
03/15/2023	\$2,165.00	03/24/2023	\$105.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$24,370.00

### 3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or receipt (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$110.22
03/13/2023	PREFERRED LABOR SIGN ASSOCIATION 2704 N. Hogan #3 , Spokane, WA 99207	Printing campaign signs : Paid to PREFERRED LABOR SIGN ASSOCIATION. 20 yard signs	\$239.80
03/13/2023	USPS 3120 S Grand Blvd , Spokane, WA 99203-9998	Fundraising events and related costs : Paid to USPS. Postage for 1450 fundraising letters	\$426.29
03/13/2023	LAWTON PRINTING 4111 E Mission Ave , Spokane, WA 99202	Fundraising events and related costs : Paid to LAWTON PRINTING. Print 1450 fundraising letters + remit envelopes (200 overrun)	\$1,962.43
03/13/2023	NORTH MOTION MEDIA 2525 E 29th Ave Ste 10B #302 , Spokane, WA 99223	Design/graphic art, etc. : Coverage of launch event and short video	\$630.00
03/13/2023	Rising Tide Consulting, LLC. 707 W 5th Ave #511 , Spokane, WA 99204	Management and consulting services : Fundraising letter - direct mail service/targeting	\$174.00
03/13/2023	Rising Tide Consulting, LLC. 707 W 5th Ave #511 , Spokane, WA 99204	Management and consulting services : Website and messaging development	\$750.00
03/13/2023	Rising Tide Consulting, LLC. 707 W 5th Ave #511 , Spokane, WA 99204	Management and consulting services : ActBlue setup/design + PDC registration	\$300.00
03/13/2023	Rising Tide Consulting, LLC.	Management and consulting services : Launch interim campaign management	\$500.00

**\$5,928.16**

Date paid	Vendor or receipt (Name and address)	Purpose of expense and/or description	Cash
	707 W 5th Ave #511 , Spokane, WA 99204		
03/30/2023	NORTH MOTION MEDIA 2525 E 29th Ave Ste 10B #302 , Spokane, WA 99223	Digital advertising : Full launch recording and edit	\$120.02
03/30/2023	Gannon Sean 3817 W Rockwell Ave , Spokane, WA 99205	Utilities, phone, and other overhead costs : PO box reimbursement	\$176.00
03/31/2023	ACTBLUE 366 Summer St , Somerville, MA 02144	Fundraising events and related costs : March service fee	\$289.40
03/31/2023	Rising Tide Consulting, LLC. 707 W 5th Ave #511 , Spokane, WA 99204	Accounting, legal, regulatory compliance, etc. : March financial compliance services	\$250.00

**\$5,928.16**

4. TOTAL EXPENDITURES:

**\$5,928.16**



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

BETSY L WILKERSON (Betsy Wilkerson)  
People for Betsy Wilkerson -  
PO Box 8442  
Spokane, WA 99203  
CITY COUNCIL MEMBER  
CITY OF SPOKANE

Coverage: 02/01/2023 to 02/28/2023  
Final report: No  
Report number: 110139387  
Election year: 2021  
Date submitted: 03/14/2023

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$65,497.12
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$65,497.12
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$62,667.55
11. Cash expenditures (Line 3 schedule A).	\$62.68	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$62.68
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$62,730.23

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$2,766.89
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$2,766.89

Candidate name

BETSY L WILKERSON (Betsy Wilkerson)

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Andy Taylor - 03/14/2023

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:				
2. TOTAL CASH RECEIPTS (LINE 2 OF C4):				\$0.00
3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):				
Date paid	Vendor or receipt (Name and address)	Purpose of expense and/or description	Cash	
N/A	Expenses	Non-itemized expenditures	\$62.68	
			\$62.68	
4. TOTAL EXPENDITURES:				\$62.68



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**SUMMARY, FULL REPORT RECEIPTS  
AND EXPENDITURES**

**C4**

BETSY L WILKERSON (Betsy Wilkerson)  
People for Betsy Wilkerson -  
PO Box 8442  
Spokane, WA 99203  
CITY COUNCIL MEMBER  
CITY OF SPOKANE

Coverage: 09/01/2022 to 09/30/2022  
Final report: No  
Report number: 110130691 Amends 110116912  
Election year: 2021  
Date submitted: 12/30/2022

**RECEIPTS**

1. Previous total cash and in-kind contributions (last C4 line 8).		\$65,497.12
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$0.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$0.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$65,497.12
9. Total pledge payments due (Line 2 schedule B).	\$0.00	

**EXPENDITURES**

10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$61,378.15
11. Cash expenditures (Line 3 schedule A).	\$1,056.68	
12. In-kind expenditures (Line 1 schedule B).	\$0.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$1,056.68
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$62,434.83

**CASH SUMMARY**

18. Cash on hand (Lines 8 - 17)		\$3,062.29
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$3,062.29

Candidate name

BETSY L WILKERSON (Betsy Wilkerson)

**I certify this report is true and complete to the best of my knowledge**

Treasurer's name and date

Andy Taylor - 12/30/2022

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:			
2. TOTAL CASH RECEIPTS (LINE 2 OF C4):			\$0.00
3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):			
Date paid	Vendor or receipt (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$56.68
09/16/2022	SPOKANE COUNTY DEMOCRATIC CENTRAL COMMITTEE 1403 W 3rd Ave , Spokane, WA 99201	Charity : Charity	\$1,000.00
			\$1,056.68
4. TOTAL EXPENDITURES:			\$1,056.68

FILED

DEC 19 2016

Superior Court  
Linda Myhre Enlow  
Thurston County Clerk

COPY

STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

NO. 16-2-04960-34

Plaintiff,

v.

JAMES M. COOPER, Jr.,  
individually, and FRIENDS OF JIM  
COOPER, a political committee,

COMPLAINT FOR CIVIL  
PENALTIES AND FOR  
INJUNCTIVE RELIEF FOR  
VIOLATIONS OF  
RCW 42.17A

Defendants.

I. NATURE OF ACTION

The State of Washington (State) brings this action to enforce the state's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendants, JAMES M. COOPER, Jr. and FRIENDS OF JIM COOPER, a political committee, violated provisions of RCW 42.17A by 1) concealing and failing to disclose the true identity of contributors to the Thurston County Democratic Central Committee, 2) by improperly transferring campaign contributions to another political committee, and 3) using campaign funds for personal use. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

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2.3 Defendant FRIENDS OF JIM COOPER (Campaign) is a political committee registered by Defendant Cooper as his authorized candidate committee on November 13, 2015. As such, the Campaign was expected to comply with the provisions of RCW 42.17A.

3.1 This Court has subject matter jurisdiction over the present case, in accordance with RCW 42.17A. The Attorney General has authority to bring this action pursuant to RCW 42.17A.765.

3.2 This Court has personal jurisdiction over Defendants, who are either a resident of the State of Washington or a political committee registered and reporting in the State of Washington. Additionally, the acts complained of here took place in Thurston County in the State of Washington.

3.3 Venue is proper in this Court pursuant to RCW 4.12.020(1).

4.1 RCW 42.17A declares as a matter of public policy “[t]hat political campaign and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be avoided.” RCW 42.17A.001(1). Further the statute provides that the provisions of the law “shall be liberally construed to promote complete disclosure of all information respecting the financing of political campaigns. . .”.

1 Finally, RCW 42.17A declares as a matter of public policy “[t]hat the people have the  
2 right to expect from their elected representatives at all levels of government the utmost  
3 of integrity, honesty, and fairness in their dealings.” RCW 42.17A.001(2).

4 4.2 Washington’s campaign finance law also requires a campaign to timely  
5 report expenditures of a candidate’s campaign. RCW 42.17A.235, .240(8);  
6 RCW 42.17A.005(20). The PDC form to report expenditures is called a “Summary,  
7 Full Report Receipts and Expenditures” and is a Form “C4.”

8 4.3 Washington’s campaign finance law requires a candidate for public office  
9 to be responsible for the expenditures of his or her campaign. “No expenditures may be  
10 made or incurred by any candidate or political committee unless authorized by the  
11 candidate or the person or persons named on the candidate’s or committee’s registration  
12 form.” RCW 42.17A.425.

13 4.4 A candidate may not dispose of campaign contributions without  
14 restriction. Under RCW 42.17A.430, “No candidate or authorized committee may  
15 transfer funds to any other candidate or other political committee.”

16 4.5 Under RCW 42.17A.435, a person may not conceal the identity of the  
17 person on whose behalf a contribution is made. Additionally, under  
18 RCW 42.17A.470(1), “[a] person, other than an individual, may not be an intermediary  
19 or an agent for a contribution.” Under RCW 42.17A.445, personal use of campaign  
20 funds is prohibited except in specific circumstances, none of which is relevant here.

21 4.6 Defendant Cooper formally declared his candidacy for Thurston County  
22 Board of Commissioners by filing Public Disclosure Commission Candidate  
23 Registration Form C-1 on November 13, 2015.

24 4.7 On October 17, 2016, the Attorney General’s Office, Thurston County  
25 Prosecuting Attorney’s Office, and state Public Disclosure Commission received a  
26 citizen action notice (Notice) from complainant Glen Morgan. In his Notice, Morgan

1 asserted that Defendants violated state law by using campaign funds to make  
2 contributions to a political party.

3 4.8 Prior to May 7, 2016, the Thurston County Democratic Central  
4 Committee announced a fundraising event to support the local political party's political  
5 activities including contributions to other democratic candidates. The event was  
6 referred to as the "Kennedy Dinner." Relevant to this litigation, the cost to attend the  
7 event was at least \$100 per ticket. This cost covers the fair market value of the actual  
8 dinner and a contribution to the Thurston County Democratic Central Committee.  
9 According to Defendants, the estimated fair market value of the dinner is \$76.19.

10 4.9 Defendant Cooper invited 14 individuals to attend the event and sit at two  
11 tables Defendants wanted to sponsor. Sixteen individuals attended the event (which  
12 included Defendant Cooper and his spouse) and were associated with the Defendants'  
13 two sponsored tables.

14 4.10 Four of the 16 attendees identified above purchased their event ticket  
15 directly from the Thurston County Democratic Central Committee.

16 4.11 On May 7, 2016, Defendant Cooper authorized an expenditure of \$1,300  
17 from campaign contributions Defendants received to purchase the additional 12 event  
18 tickets. Defendants reports this expenditure to the Thurston County Democratic Central  
19 Committee on their June 10, 2016 C4 report.

20 4.12 On information and belief, of the 12 additional individuals who attended  
21 using Defendants' purchased tickets, Defendants state that certain individuals  
22 reimbursed Defendants to defray the cost of event tickets which included a campaign  
23 contribution to the Thurston County Democratic Central Committee.

24 4.13 Defendants used campaign funds to purchase tickets for Defendant  
25 Cooper and his spouse to attend the event.

26 ///

4.14 To the extent that individuals contributed to the Campaign to cover the cost of their ticket price, but their contributions did not cover the fair market value of the dinner, Defendants used campaign funds to pay both the additional dinner cost as well as the contribution to the Thurston County Democratic Central Committee.

## V. CLAIMS

The State re-alleges and incorporates by reference all the factual allegations contained in the preceding paragraphs, and based on those allegations, makes the following claims:

5.1 First Claim: The State reasserts the factual allegations made above and further asserts that Defendants in violation of RCW 42.17A.435 and .470 concealed and failed to disclose the true identity of contributors to the Thurston County Democratic Central Committee when Defendants purchased tickets to the Thurston County Democratic Central Committee's pre-election fundraising dinner in Defendants' name and received reimbursement from those contributors for the tickets.

5.2 Second Claim: The State reasserts the factual allegations made above and further asserts that Defendants in violation of RCW 42.17A.430(8) improperly transferred Defendants' campaign funds to another political committee.

5.3 Third Claim: The State reasserts the factual allegations made above and further asserts that Defendants in violation of RCW 42.17A.445 improperly used campaign funds for personal use including partial payment of the fair market value of the dinner as well as contribution to the Thurston County Democratic Central Committee's pre-election fundraising dinner.

5.4 Fourth Claim: The State reasserts the factual allegations made above and further asserts that the Defendants' actions stated in the above claims were negligent and/or intentional.


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6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750, including but not limited to imposition of a civil penalty, all to be determined at trial;

6.3 For temporary and permanent injunctive relief, as authorized by RCW 42.17A.750(1)(h); and

DATED this 19th day of December, 2016.

  
LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
WALTER M. SMITH, WSBA No. 46695  
Assistant Attorney General  
Attorneys for Plaintiff State of Washington

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
 110065049  
 12-10-2021

Candidate or Committee Name (Do not abbreviate. Include full name) <b>(People for Betsy Wilkerson)</b>			
Mailing Address <b>PO Box 8442</b>		City <b>Spokane, WA</b>	
Zip + 4 <b>99203</b>	Office Sought (Candidates) <b>CITY COUNCIL MEMBER</b>	Election Date <b>2021</b>	<b>*For PACs, Parties &amp; Caucus Committees:</b> During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate?</u>
Report Period Covered <b>10/26/21</b>	From (last C-4) <b>10/26/21</b>	To (end of period) <b>11/30/21</b>	
Final Report? Yes No <b>X</b>			

## RECEIPTS

\*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	<b>\$65,092.12</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$405.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$405.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$65,497.12</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

## EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		<b>\$41,468.51</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$16,899.17</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$16,899.17</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$58,367.68</b>

<b>CANDIDATES ONLY</b> <table style="width:100%;"> <tr> <th></th> <th>Won</th> <th>Lost</th> <th>Unopposed</th> <th>Name not on ballot</th> </tr> <tr> <td>Primary election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>General election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <b>Treasurer's Daytime Telephone No.:</b> <b>(509) 701-7843</b>		Won	Lost	Unopposed	Name not on ballot	Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>CASH SUMMARY</b> 18. Cash on hand (Line 8 minus line 17) .....	<b>\$7,129.44</b>
	Won	Lost	Unopposed	Name not on ballot													
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>													
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>													
19. Liabilities: (Sum of loans and debts owed) .....		<b>\$0.00</b>															
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....		<b>\$7,129.44</b>															

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature <b>BETSY WILKERSON</b>	Date <b>12/10/21</b>	Treasurer's Signature <b>Andy Taylor</b>	Date <b>12/10/21</b>
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# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

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

Report Date

(People for Betsy Wilkerson)

10/26/21

11/30/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/26/2021	\$50.00	11/10/2021	\$5.00			
10/27/2021	\$150.00	11/15/2021	\$100.00			
10/29/2021	\$100.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$405.00**

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

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

CODE  
DEFINITIONS  
ON NEXT PAGE

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

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

### 3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$97.14
10/26/21	USPS 3120 S Grand Blvd Spokane, WA 99203-9998	P	9,213 postcards. Lawton invoice #49781.	\$2,285.05
10/29/21	LAWTON PRINTING 4111 E Mission Ave Spokane, WA 99202	L	Invoice #49798	\$1,399.56
10/29/21	USPS 3120 S Grand Blvd Spokane, WA 99203-9998	P	Postage for postcards	\$1,512.42
11/01/21	RILEY SMITH 707 W 5th Ave, Apt 511 Spokane, WA 99204	M	October campaign management	\$1,500.00
11/01/21	EFFECTV Five Times Square, Ninth Floor New York, NY 10036	B	ads. Client ID #0038760	\$8,000.00
11/19/21	SEAN GANNON 23 Sao Augustine Way San Rafael, CA 94903	M	Communications - transition pay	\$1,000.00

Total from attached pages \$ **\$1,105.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$16,899.17**

## EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

(People for Betsy Wilkerson)

10/26/21

11/30/21

[illegible]

Page Total     \$     \$1,105.00



# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
110036407  
AMENDS  
110036402  
07-27-2021

Candidate or Committee Name (Do not abbreviate. Include full name) <b>(People for Betsy Wilkerson)</b>			
Mailing Address <b>PO Box 8442</b>		City <b>Spokane, WA</b>	
Zip + 4 <b>99203</b>	Office Sought (Candidates) <b>CITY COUNCIL MEMBER</b>	Election Date <b>2021</b>	<b>*For PACs, Parties &amp; Caucus Committees:</b> During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate?</u>
Report Period Covered From (last C-4) <b>07/13/21</b>	To (end of period) <b>07/26/21</b>	Final Report? Yes No <b>X</b>	

## RECEIPTS

\*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	<b>\$49,788.09</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$3,017.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$3,017.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$52,805.09</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

## EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		<b>\$15,760.35</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$1,851.06</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$1,851.06</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$17,611.41</b>

<b>CANDIDATES ONLY</b>	<b>CASH SUMMARY</b>
Won Lost Unopposed Name not on ballot	18. Cash on hand (Line 8 minus line 17) .....
Primary election <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance.]
General election <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	19. Liabilities: (Sum of loans and debts owed) .....
Treasurer's Daytime Telephone No.: <b>(509) 701-7843</b>	20. Balance (Surplus or deficit) (Line 18 minus line 19) .....
	<b>\$35,193.68</b>
	<b>\$0.00</b>
	<b>\$35,193.68</b>

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature <b>BETSY WILKERSON</b>	Date <b>07/27/21</b>	Treasurer's Signature <b>Andy Taylor</b>	Date <b>07/27/21</b>
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# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

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

Report Date

(People for Betsy Wilkerson)

07/13/21

07/26/21

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
07/14/2021	\$200.00	07/20/2021	\$300.00	07/23/2021	\$500.00	
07/20/2021	\$10.00	07/21/2021	\$102.00	07/26/2021	\$1,150.00	
07/20/2021	\$250.00	07/22/2021	\$50.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$3,017.00**

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

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

CODE  
DEFINITIONS  
ON NEXT PAGE

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

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

### 3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
07/14/21	LAWTON PRINTING 4111 E Mission Ave Spokane, WA 99202	L	4,791 postcards	\$729.09
07/14/21	USPS 3120 S Grand Blvd Spokane, WA 99203-9998	P	for mailing of 4,791 postcards printed by Lawton	\$779.03
07/21/21	PREFERRED LABOR SIGN 2704 N. Hogan #3 Spokane, WA 99207	L	200 remit envelopes	\$84.94
07/21/21	INLANDER 1227 W. Summit Parkway Spokane, WA 99201	N	ads	\$258.00

Total from attached pages \$ **\$0.00**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$1,851.06**

## Attachment to Schedule A Additional Deposits

for the period: 07/13/21 07/26/21

3

Name

(People for Betsy Wilkerson)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
07/26/21	\$455.00				