

| Respondent Name   |
|---|
| Ty Stober   |
| Complainant Name  |
| Glen Morgan   |
| Complaint Description   |
| <p><a href="#">Glen Morgan</a><br/>reported via the portal<br/>(Wed, 2 Aug 2023 at 12:44 AM)</p> <p>To whom it may concern,</p> <p>It has come to my attention that Vancouver City Council candidate Ty Stober has violated Washington State's campaign finance laws (<b>RCW 42.17A</b>) during his current 2023 campaign for council position 5. The details are as follows:</p> <p><b>1) Acceptance of Illegal overlimit contributions (Violation of RCW 42.17A.405(2))</b></p> <p>This is a blatant violation and easy to identify. I've attached copies of the relevant C3 reports proving this violation.</p> <p>As PDC staff know well, and as all political candidates running for office in Washington State have been made aware, there are limits to the campaign contributions they can accept.</p> <p>There is only one candidate for this Vancouver City Council seat for which Ty Stober is running. This means he does not have a primary. <b>Despite this fact, he accepted at least \$1,000 in illegal overlimit contributions explicitly designated for a Primary election that will never happen.</b> To be fair to candidate Stober, at the time he accepted this illegal overlimit contribution, he may not have known that a primary would not be in the cards this election cycle, however, he has had several months to resolve this illegal behavior, and he has <b>willfully chosen to ignore the law and keep the illegal cash.</b></p> <p>In fact, it appears he may have already spent this cash, but regardless, he must refund or forfeit these illegal contributions immediately in order to at least pretend to comply with Washington State's campaign finance laws.</p> <p>Specifically, the illegal overlimit contributions are as follows and clearly designated as "Primary" campaign contributions:</p> <ul style="list-style-type: none"> <li>On 11/29/2021 - \$1,000 – from James Mullen – <b>PDC C3 report # 110063516 (see attached)</b></li> </ul> <p>Please note, this same donor also donated another \$1,000 to the Stober campaign on March 6, 2023 (<b>See PDC C3 report # 110140004</b> attached). Technically, it is the original "Primary" election designated contribution of \$1,000 which must be refunded or forfeited from this campaign in order to come back into some type of compliance with Washington State's campaign finance laws.</p> <p>I will also note, for the record, <b>this campaign needs to correct every C3 report they have filed to date because all contributions are designated for a primary election campaign that never happened.</b></p> <p>I will keep this campaign in mind when I browse the frequent fliers for future violation reports. For the amount of campaign cash this candidate is squandering on "compliance" costs in an uncontested general election campaign for the Vancouver City Council, this seems like an easy violation to avoid.</p> |

Let me know if you need anything else from me.

Best Regards,

Glen Morgan

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

The public has a right to know if their politicians are trying to take illegal overlimit secret campaign contributions and if those same politicians (like this one) just think they can get away with breaking the law. The public has a right to be concerned what other lawbreaking this guy is up to when he doesn't think someone is watching? Who knows? But, let's start with the obvious lawbreaking for now.

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

All attached.

**List of potential witnesses**

The "compliance" officer for sure. The Treasurer as well. The candidate, maybe the donor too.

**Certification (Complainant)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



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**

Ty Stober (STOBER TY)  
Ty Stober for Vancouver -  
PO Box 131  
Vancouver, WA 98666  
CITY COUNCIL MEMBER  
CITY OF VANCOUVER

Deposit date: 03/06/2023  
Report number: 110140004  
Submitted date: 03/26/2023

**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

| Date received |   | Amount   | Total  |
|---------------|---|----------|--------|
|               | a. Anonymous  | \$0.00   | \$0.00 |
|               | 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   |        |
|               | d. Miscellaneous receipts (interest, refunds, auctions, other)                      | \$0.00   |        |
| 03/06/2023    | e. Small contributions (6 persons giving)   | \$100.00 |        |

**2. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT: \$1,900.00**

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

**3. ITEMIZED CONTRIBUTIONS**

| Date received | Contributor<br>(Name and address)                               | Employer and<br>address                                 | Amount     | Aggregate<br>total    |
|---------------|---|---|------------|-----------------------|
| 03/06/2023    | TROOBNICK JENNIFER<br>1910 BERGERON CT , VANCOUVER, WA<br>98661 |   | \$100.00   | Primary<br>\$100.00   |
| 03/06/2023    | ETENGOFF LOREN<br>2430 West L Drive , Washougal, WA 98671       |   | \$100.00   | Primary<br>\$100.00   |
| 03/06/2023    | POCAN ROBERT<br>1940 Woodbluff Dr , Wendell, NC 27591           |   | \$50.00    | Primary<br>\$100.00   |
| 03/06/2023    | WALKER JACOB<br>37 Beryl St , Roslindale, MA 02131              | Block & Leviton LLP<br>Boston MA<br>Occupation: Partner | \$250.00   | Primary<br>\$250.00   |
| 03/06/2023    | MULLEN JAMES<br>8502 NW 12th Ave , Vancouver, WA 98665          | The Herbery<br>Vancouver WA<br>Occupation: OWNER        | \$1,000.00 | General<br>\$1,000.00 |
| 03/06/2023    | Faubion Margo<br>2712 NE 152nd Ave , Vancouver, WA 98684        |   | \$50.00    | Primary<br>\$50.00    |
| 03/06/2023    | Freidberg Stan<br>4310 NW Lavina St , Vancouver, WA 98660       | Occupation:<br>RETIRED                                  | \$250.00   | Primary<br>\$250.00   |

Date of deposit  
03/06/2023

**I certify this report is true and complete to the best of my knowledge**  
Treasurer's signature and date  
Marsha Manning - 03/26/2023

# CASH RECEIPTS MONETARY CONTRIBUTIONS

## C3

(1/02)

THIS SPACE FOR OFFICE USE

110063516

12-04-2021

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

(Ty Stober for Vancouver)

Mailing Address

PO Box 131

City Zip + 4 Office Sought (candidates)  
**Vancouver, WA 98666 CITY COUNCIL MEMBER**

Election Date  
**2023**

### 1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date Received |  | Amount | Total |
|---------------|--|--------|-------|
|               | a. Anonymous .....   |        |       |
|               | b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) .....        |        |       |
|               | c. Loans, notes, security agreements. Attach Schedule L .....                                    |        |       |
|               | d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....         |        |       |
|               | e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons) |        |       |

### 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:*              | P<br>R<br>I | G<br>E<br>N | Amount               | Aggregate*<br>Total       |
|---------------|--|---|-------------|-------------|----------------------|---------------------------|
| 11/29/21      | RICHARD ZAHLER<br>PO Box 87061<br>VANCOUVER, WA 98687                | RWZ LL<br>Vancouver, WA<br>OccupationMANAGER    | X           |             | \$1,000.00           | \$1,000.00                |
| 11/29/21      | JAMES MULLEN<br>8502 NW 12th Ave<br>Vancouver, WA 98665              | The Herbery<br>Vancouver, WA<br>OccupationOWNER | X           |             | \$1,000.00           | \$1,000.00                |
|               |  | Occupation                                      |             |             |                      |                           |
|               |  | Occupation                                      |             |             |                      |                           |
|               |  | Occupation                                      |             |             |                      |                           |
|               |  | Occupation                                      |             |             |                      |                           |
|               | <input type="checkbox"/> Check here if additional pages are attached | Sub-total<br>Amount from attached pages         |             |             | \$2,000.00<br>\$0.00 | *See reverse for details. |

### 3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

\$2,000.00

4. Date of Deposit

11/29/21

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

Treasurer's Signature

Date

Marsha Manning

12-04-2021

Treasurer's Daytime Telephone No.: (360) 609-3527