

**Respondent Names**

Thurston County Democrats

**Complainant Name**

Glen Morgan

**Complaint Description**

Glen Morgan  
reported via the portal  
11 days ago (Mon, 7 Aug 2023 at 11:26 AM)  
To whom it may concern,

It has come to my attention recently that the Thurston County Democrats have, once again, decided to violate Washington State's campaign finance laws (RCW 42.17A). I realize this is commonplace for them, but the details are as follows:

1. Failure to timely update C1pc to include officers, essentially keeping the true officers of this PAC secret from the public (Violation of RCW 42.17A.205(2))

The current committee registration can be found here, and it was last filed in March:

[https://apollo.pdc.wa.gov/public/registrations/registration?registration\\_id=50983](https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=50983)

The committee's current website indicates that Tela Hogle and Maria Sigüenza are also members of the executive committee but this is not indicated on the committee's registration, which is a violation.

2. Failure to list the vendor and the address of the vendor for in-kind contributions, therefore concealing from the public the true source of these contributions (Violation of RCW 42.17A.240, RCW 42.17A.235)

When an individual or entity makes a donation of goods or services to a political committee so that the committee may attempt to sell these goods or services to others in exchange for money, this is an in-kind contribution.

I want to draw attention to the PDC's own website recommendations for how PACs and campaigns need to report this information.

See original link here:

<https://www.pdc.wa.gov/registration-reporting/candidates-committees/contributions/kind-contributions>

Specifically, I want to draw attention to the PDC's specific requirements of reporting:

“In-kind donations that are not incidental must be fully reported in Part 1 of Schedule B to the C-4 with the following details: the date the contribution was received; the name and full address of the contributor; if the in-kind contribution is a good or service purchased from a vendor, include the name and address of the vendor; a brief description of the contribution; its fair market value; the cumulative total this contributor has given for the primary or general election, whichever applies; a designation whether this contribution is for the primary or general election; and if the contributor is an individual who has cumulatively given more than \$250 to the campaign, including both primary and general contributions, identify the individual's employer (by name, city and state) and occupation.”

This committee has failed to do this for both auction items and regular in-kind contributions.

The sheer volume of violations in this category of lawbreaking is so extensive, it seemed more effective for me to attach a complete spreadsheet of these violations so that the PDC staff can use it to verify the violations in an efficient and methodical manner. I also provide this information in this way so that the spreadsheet can be used by the lawbreakers as a corrective reference sheet to make the process they need to follow to correct their lawbreaking a more efficient one and to ensure that they don't miss anything.

For both staff and the lawbreaker's reference, I will detail just one of the 57 deficient examples provided, so that the obvious lawbreaking can be more efficiently spotted and hopefully corrected in the future to prevent the need to file complaints like this one:

Violation Example #10 - \$2,500 on 12/5/2018 (PDC Report #100880069), the address for both Pacifica Law Group and the Washington State Democratic Central Committee were not provided, despite the crystal-clear legal requirement to do so.

Presumably, this was The Washington State Democrats paying for the final balance of some legal fees incurred by the Thurston County Democrats when they were sued by the Attorney General's office based on a complaint I filed against them years ago (I'm assuming this is PDC Enforcement Case #11660, or PDC Enforcement Case #15417, or a combination of the two). However, there is really no way for the public to be certain unless this committee starts following the laws so clearly laid out and explained by the PDC on their website above.

Obviously, it is perfectly fine for the State Democratic Party to pay for the random legal fees of the Thurston County Democrats when they get into frequent legal trouble, and this is an appropriate in-kind contribution category. However, since these legal fees were originally incurred by the Thurston County Democrats for their historic frequent lawbreaking, it might be wise to start following the law now.

Some notes on documenting these violations:

I believe this method of documenting this type of lawbreaking is better than filing individual complaints to each violation, but if PDC staff finds this process too comprehensive, I am willing to file individual complaints for each specific violation committed by political committees like this. Unless I have that as a specific staff-generated request, I will continue to provide these types of serial, high-volume law-breaking activities in the current manner, which, at this time appears to be most efficient for both staff and the lawbreakers.

Please note, I have provided this file in both Excel and PDC format for reference. The direct link to each specific C4 (or C3, if that applies) is in the right-hand column. The dollar amounts, the date, and the inadequate descriptions (if any) are included for reference as well as the lacking detail on the “contributor” (if any) is provided as well for both staff and the lawbreaker’s reference.

3) Failure to timely report contributions or expenditures (Violation of RCW 42.17A.235, RCW 42.17A.240)

Frankly, I should have caught these earlier, and I believe I have brought up this concern in the past, but it might be more effective for this committee to start filing their reports in a timely manner. In a distressingly, all too often repeated pattern, this committee files reports late (52 reports, to be exact). Many of these reports in 2023 were filed weeks late. This is particularly surprising considering their historic failure to follow the law in the past and the various enforcement actions taken by the PDC and the AG’s office against this committee in an effort to convince them to comply with the law.

Again, I’ve provided both an Excel file and PDF version of the same file for ease of staff and the lawbreaker’s reference as they re-educate themselves with Washington State’s campaign finance laws and are reminded that these laws apply to them as well. They are not exempt from them as much as they might want to pretend these laws don’t matter.

Some notes on documenting these violation:

Again, as I strive to provide the best data possible both for efficiency of staff and the lawbreakers I have identified, every report can be direct linked to the URL in the far-right hand column. The date the report was due is provided and the actual date it was finally sent to the PDC and the total number of days late for those reports is included for ease of PDC staff research effort, and to quantify the significance of these violations both individually and cumulatively with the obvious problems caused by not informing the public about the truth of their activities in a timely manner.

The Thurston County Democrats: A long history of breaking the law:

My friends at the Thurston County Democrats know that I have frequently exposed the truth about their lawbreaking in the past, and this complaint is merely the most recent reminder, but for new PDC staff with less extensive experience with the Thurston County Democrats

history of lawbreaking, it is helpful to put this most recent complaint in the historical context and pattern of behavior that it deserves. I am aware that many PDC staffers have been members of the Thurston County Democratic Party in the past, so those staffers may have some personal experience with this lawbreaking, but this is still a worthwhile exercise to better understand why this current lawbreaking should matter:

I originally started paying attention to the Thurston County Democrats failures to follow the law back in 2017, shortly after I started writing stories about how they were largely funded by racist, hate-cult leader JZ Knight (I documented Knight's racist speeches in videos captured by followers of hers and which had been posted on YouTube and reported in the media at the time, which is why the State Democratic Party rejected her donations back in 2012).

Based on an original series of complaints I filed against the Thurston County Democrats (See PDC Enforcement Case #15417 & Case #11660), the Washington State Attorney General was forced to file a legal action against this committee in an effort to help them comply (See Thurston County Court Case #17-2-00972-34, attached). They were put on a payment plan by the AG's office for the \$27,000+ settlement at the time, and apparently they were also on a payment plan with their lawyers as well, as indicated by the violation I expose in the example earlier in this complaint.

I had some hope they would turn over a new leaf and start complying with the law after that experience, but a few years have passed now, and it appears all is forgotten. Perhaps the PDC staff can help guide them back into the fold of following the law once again because clearly the previous lawsuits and settlements haven't done the trick.

Feel free to let me know if you need anything else. Obviously, I haven't been keeping up on some of these local committees as well as I should have, so I will resolve to pay more attention in the near future.

Best Regards,

Glen Morgan

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

The public has a right to know what a local political committee is doing - who is funding them, how they spend their cash hoard, and who is even running the committee. Unfortunately, this local Thurston County crew has a long history of breaking the law, and despite the AG's lawsuit against them a few years ago, seems to be sliding back into their old lawbreaking habits. This includes concealing critical information about the true source of in-kind contributions on in almost 60 instances, and many cases of late reporting. Plus, not keeping their information updated on the ever-changing officer list. They can do better even if they historically don't

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

All spreadsheets are very detailed with direct links to the original reports.

**List of potential witnesses with contact information to reach them**

Every officer, past and present. Probably the in-kind contributors if they can be found - verify if they even exist or if the contributions are real. It wouldn't hurt to subpoena their bank records and check for receipts.

**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.

## Thurston County Democrats - Illegal In-Kind Contribution Report Violations (Aug 2023 complaint)

amount	cash_or_in_kind	receipt_date	description	contributor_name (Illegal description - lack of details)	url - Direct Link to Deficient PDC report
\$	32.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	ALLEN BARBARA	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	835.00 In-kind	9/12/2018	KENNEDY DINNER LOW COST FUNDRAISER INKIND DONATIONS OF DESSERTS	LOW COST FUNDRAISER	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	20.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND DONATION OF MOVIE POSTER FOR FRAMING	OLYMPIA FILM SOCIETY	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	432.00 In-kind	10/9/2018	DONATED LABOR FOR 2018 ENDORSEMENT MAILER	OLYMPIA PRINTING CO-OP	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	86.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	PACKAGE KATHERINE A	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	20.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	RICEVUTO CHERYL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	30.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	SEGALL SARAH B	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	40.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	TANZI PATRICIA M	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	40.00 In-kind	9/12/2018	KENNEDY DINNER IN-KIND WINE DONATION	TUFFORD DANIEL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
\$	2,500.00 In-kind	12/5/2018	PAYMENT OF PACIFICA LAW GROUP BALANCE	WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100880069">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100880069</a>
\$	43.71 In-kind	5/11/2019	INK FOR PHOTOGRAPHY AT KENNEDY DINNER	CARLOS TRACEY	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	100.00 In-kind	5/18/2019	2 HOURS OF PHOTOGRAPHY @ \$50 PER HOUR	CARLOS TRACEY	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	165.00 In-kind	5/18/2019	CENTERPIECE ARRANGEMENTS FOR KENNEDY DINNER	GADMAN MEREN	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	100.00 In-kind	5/13/2019	DONATION OF A PROJECTOR	JAQUA DEBRA	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	45.00 In-kind	5/18/2019	KENNEDY DINNER 2019 IN-KIND WINE DONATION	JONES NATHANIEL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	656.78 In-kind	5/18/2019	IN-KIND KENNEDY DINNER DESSERT DONATIONS	LOW COST FUNDRAISER	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	500.00 In-kind	5/18/2019	IN-KIND DONATION OF LUAU PARTY FOR JUNE 2019	SELBY CHERYL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	250.00 In-kind	5/18/2019	KENNEDY DINNER 2019 IN-KIND WINE DONATION	WILLIAMS NICOLE L	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100908209</a>
\$	300.00 In-kind	12/10/2020	6 hours of Financial Review	Garst Christine B	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110005684">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110005684</a>
\$	300.00 In-kind	2/8/2023	6 hours of Financial Review	Christine B Garst	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110138969">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110138969</a>

receipt_date	description	memo	contributor_name	Deficient & Illegal limited description of In-Kind	URL - Direct Link to Deficient PDC Report
9/12/2018	(Fair Market Value: 30.00; Sale Price: 37.00)Item description: LIGHTNING STRIKE SILVER PIN AND PENDANT	Item Buyer	ABRAHAM DIANE K		<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
9/12/2018	(Fair Market Value: 20.00; Sale Price: 22.00)Item description: \$20 ORCA BOOKS GIFT CARD	Item Buyer	BOOTH JEFFREY JR		<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
9/12/2018	(Fair Market Value: 75.00; Sale Price: 81.00)Item description: FRENCH PRESS, COFFEE AND DEMITASSE CUPS	Item Buyer	BOOTH JEFFREY JR		<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
9/12/2018	(Fair Market Value: 53.00; Sale Price: 74.00)Item description: GRAMPA BILL'S BBQ BASKET	Item Buyer	BOOTH JEFFREY JR		<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>

	(Fair Market Value: 20.00; Sale Price: 25.00)Item description: BREAD PEDDLER \$20			
9/12/2018	GIFT CERTIFICATE	Item Buyer	CAROLE LAVONNE	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 10.00; Sale Price: 12.00)Item description: OAK GALL INK AND			
9/12/2018	FEATHER QUILL PEN	Item Buyer	COOK YANAH G	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 20.00; Sale Price: 25.00)Item description: POP UP FOOD PICNIC			
9/12/2018	FOOD COVER	Item Buyer	COOK YANAH G	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 50.00; Sale Price: 100.00)Item description: MT RAINIER BY			
9/12/2018	GOVERNOR JAY INSLEE	Item Buyer	COOPER KELLY D	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 75.00; Sale Price: 180.00)Item description: FARM VISIT WITH			
9/12/2018	FARM FRESH APPETIZERS	Item Buyer	DOLAN LAURIE	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 75.00; Sale Price: 100.00)Item description: BEER BREWING			
9/12/2018	WITH BILL FISHBURN	Item Buyer	JONES SCOTT	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 25.00; Sale Price: 32.00)Item description: RIVER'S EDGE \$25			
9/12/2018	GIFT CERTIFICATE	Item Buyer	LETT WILL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 30.00; Sale Price: 45.00)Item description: SILVER & AMBER			
9/12/2018	GEM STONE RING	Item Buyer	MEDEIROS SUE	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 25.00; Sale Price: 35.00)Item description: \$25 GIFT CERTIFICATE			
9/12/2018	TO DILLINGER'S	Item Buyer	MIDDLETON MICHAEL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 50.00; Sale Price: 60.00)Item description: BLACKBIRD			
9/12/2018	MERCANTILE CLUB BAG, WINE	Item Buyer	MIDDLETON MICHAEL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 75.00; Sale Price: 88.00)Item description: \$75 GIFT CARD			
9/12/2018	MCMENAMINS SPAR CAFE	Item Buyer	MIDDLETON MICHAEL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 20.00; Sale Price: 30.00)Item description: OMBRE SOUP BOWLS			
9/12/2018	BY MIKASA	Item Buyer	MORGANROTH THOMAS	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 35.00; Sale Price: 145.00)Item description: HOTEL RL			
9/12/2018	FAMOUSLY FABULOUS CHEESECAKE	Item Buyer	PACIFIC NORTHWEST REGIONAL COUNCIL OF CARPENTERS, SSF	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 300.00; Sale Price: 425.00)Item description: CANOE TRIP FOR 2			
9/12/2018	TO 4 PLUS A GOURMET LUNCH	Item Buyer	PACIFIC NORTHWEST REGIONAL COUNCIL OF CARPENTERS, SSF	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 8.00; Sale Price: 11.00)Item description: PINK PUSSY HAT			
9/12/2018		Item Buyer	PACKAGE KATHERINE A	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 38.00; Sale Price: 45.00)Item description: MISS MOFFETTS			
9/12/2018	MYSTICAL CUPCAKES \$38 GIFT CARD	Item Buyer	PACKAGE KATHERINE A	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 25.00; Sale Price: 35.00)Item description: \$25 GIFT CERTIFICATE			
9/12/2018	TO DILLINGER'S	Item Buyer	PACKAGE KATHERINE A	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 100.00; Sale Price: 130.00)Item description: OYSTER BAR \$100			
9/12/2018	GIFT CARD	Item Buyer	REVELAS JESSICA	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 8.00; Sale Price: 10.00)Item description: PINK PUSSY HAT			
9/12/2018		Item Buyer	RODRIGUES MARIA L	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
	(Fair Market Value: 100.00; Sale Price: 200.00)Item description: FARM VISIT FOR UP			
9/11/2019	TO SIX PEOPLE	Item Buyer	BERMAN SUSAN	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100931247">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100931247</a>
	(Fair Market Value: 300.00; Sale Price: 375.00)Item description: BOAT CRUISE AND			
5/18/2019	DINNER FOR FOUR	Item Buyer	GOLDENBERG MATTHEW	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
	(Fair Market Value: 20.00; Sale Price: 30.00)Item description: WE CAN DO IT TOTE			
5/18/2019	& COIN PURSE	Item Buyer	GOTCHER CHUCK	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>

5/18/2019	(Fair Market Value: 140.00; Sale Price: 250.00 Item description: WINDOW CLEANING BY WINDOW GENIE	Item Buyer	KNOX PAUL	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
5/18/2019	(Fair Market Value: 330.00; Sale Price: 450.00 Item description: TWO NIGHT STAY AT COPPER CREEK INN	Item Buyer	PACIFIC NORTHWEST REGIONAL COUNCIL OF CARPENTERS, SSF	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
5/18/2019	ANGELS TWO TICKETS. (Fair Market Value: 50.00; Sale Price: 55.00 Item description: SPARKLING WINE	Item Buyer	PARSHLEY LISA	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
5/18/2019	BASKET (Fair Market Value: 42.00; Sale Price: 50.00 Item description: BATDORF &	Item Buyer	PATTIN DEBORAH K	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
5/18/2019	BRONSON ROASTED COFFEE (Fair Market Value: 100.00; Sale Price:	Item Buyer	PRATT CYNTHIA R	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
6/30/2022	101.00 Item description: 90 minute massage (Fair Market Value: 12.00; Sale Price:	Item Buyer	Kunze Leanne	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098379">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098379</a>
6/27/2022	14.00 Item description: containers (Fair Market Value: 75.00; Sale Price:	Item Buyer	Gates Donna R	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110096337">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110096337</a>
6/14/2022	100.00 Item description: lamp (Fair Market Value: 25.00; Sale Price:	Item Buyer	Wheatley Helen	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720</a>
6/14/2022	40.00 Item description: wind chime (Fair Market Value: 150.00; Sale Price: 280.00 Item description: union carpentry	Item Buyer	Vincent Florence	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720</a>
6/14/2022	services (Fair Market Value: 30.00; Sale Price:	Item Buyer	Gear John	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720</a>
6/13/2022	51.00 Item description: vote earrings	Item Buyer	Hogle Tela	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094639">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094639</a>

# Thurston County Democrats - Illegal Late Reporting - Aug 2023 update

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity	Filer	Hyperlink
110158699	C3	0	6/29/2023			7/3/2023	7/11/2023	8	\$25.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158699">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158699</a>
110158698	C3	0	6/30/2023			7/3/2023	7/11/2023	8	\$8.46	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158698">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158698</a>
110158472	C3	0	6/28/2023			7/3/2023	7/10/2023	7	\$275.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158472">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158472</a>
110158468	C3	0	6/22/2023			6/26/2023	7/10/2023	14	\$25.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158468">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158468</a>
110158467	C3	0	6/16/2023			6/19/2023	7/10/2023	21	\$1,185.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158467">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158467</a>
110158471	C3	0	6/12/2023			6/19/2023	7/10/2023	21	\$452.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158471">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158471</a>
110158473	C3	0	6/14/2023			6/19/2023	7/10/2023	21	\$13.78	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158473">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158473</a>
110158469	C3	0	6/8/2023			6/12/2023	7/10/2023	28	\$25.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158469">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158469</a>
110158470	C3	0	6/5/2023			6/12/2023	7/9/2023	27	\$75.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158470">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110158470</a>
110130122	C4	0		11/1/2022	11/30/2022	12/12/2022	12/15/2022	3	\$12,280.89	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130122">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130122</a>
110129934	C3	0	11/29/2022			12/12/2022	12/13/2022	1	\$165.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129934">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129934</a>
110129933	C3	0	11/28/2022			12/12/2022	12/13/2022	1	\$50.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129933">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129933</a>
110129935	C3	0	11/30/2022			12/12/2022	12/13/2022	1	\$88.31	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129935">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129935</a>
110129930	C3	0	11/18/2022			12/12/2022	12/13/2022	1	\$75.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129930">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129930</a>
110129929	C3	0	11/15/2022			12/12/2022	12/13/2022	1	\$25.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129929">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129929</a>
110129932	C3	0	11/25/2022			12/12/2022	12/13/2022	1	\$60.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129932">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129932</a>
110129931	C3	0	11/22/2022			12/12/2022	12/13/2022	1	\$25.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129931">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110129931</a>
110124219	C4	110119890		9/1/2022	10/17/2022	10/18/2022	11/1/2022	14	\$16,305.62	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110124219">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110124219</a>
110117394	C3	0	9/30/2022			10/3/2022	10/9/2022	6	\$2.15	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110117394">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110117394</a>
110113918	C4	110112544		7/26/2022	8/31/2022	9/12/2022	9/19/2022	7	\$31,781.97	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113918">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113918</a>
110113915	C3	0	8/31/2022			9/5/2022	9/19/2022	14	\$1.67	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113915">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113915</a>
110108307	C4	110103139		7/12/2022	7/25/2022	7/26/2022	8/23/2022	28	\$37,450.40	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108307">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108307</a>
110108304	C3	110103135	7/22/2022			7/25/2022	8/23/2022	29	\$576.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108304">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108304</a>
110103133	C3	0	7/19/2022			7/25/2022	7/26/2022	1	\$8,775.79	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103133">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103133</a>
110103132	C3	0	7/18/2022			7/25/2022	7/26/2022	1	\$37,274.00	Thurston County Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103132">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103132</a>

110103135	C3	0	7/22/2022		7/25/2022	7/26/2022	1	Thurston County \$550.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103135">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103135</a>
110103134	C3	0	7/20/2022		7/25/2022	7/26/2022	1	Thurston County \$582.21 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103134">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110103134</a>
110099301	C3	110098382	7/5/2022		7/11/2022	7/12/2022	1	Thurston County \$10,826.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110099301">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110099301</a>
110099303	C3	110098387	7/6/2022		7/11/2022	7/12/2022	1	Thurston County \$3,988.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110099303">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110099303</a>
110098379	C3	110096348	6/30/2022		7/4/2022	7/11/2022	7	Thurston County \$127.75 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098379">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110098379</a>
110094720	C3	0	6/14/2022		6/20/2022	6/26/2022	6	Thurston County \$1,130.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094720</a>
110094721	C3	0	6/15/2022		6/20/2022	6/26/2022	6	Thurston County \$190.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094721">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094721</a>
110094723	C3	0	6/17/2022		6/20/2022	6/26/2022	6	Thurston County \$75.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094723">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094723</a>
110094639	C3	0	6/13/2022		6/20/2022	6/25/2022	5	Thurston County \$356.00 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094639">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110094639</a>
110095964	C4	110090713	5/1/2022	5/31/2022	6/10/2022	7/3/2022	23	Thurston County \$4,007.18 Democrats (WA) (TCD)	<a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110095964">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110095964</a>
110065739	C3	0	10/31/2021		11/1/2021	12/10/2021	39	Thurston County \$2.30 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110065739">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110065739</a>
110038143	C4	110037006	7/13/2021	7/26/2021	7/27/2021	8/2/2021	6	Thurston County \$6,906.20 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110038143">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110038143</a>
110035154	C3	0	7/16/2021		7/19/2021	7/24/2021	5	Thurston County \$25.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110035154">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110035154</a>
110035153	C3	0	7/15/2021		7/19/2021	7/24/2021	5	Thurston County \$25.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110035153">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110035153</a>
110036988	C4	110033337	6/1/2021	7/12/2021	7/13/2021	7/27/2021	14	Thurston County \$4,171.85 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110036988">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110036988</a>
110033329	C3	0	6/30/2021		7/5/2021	7/13/2021	8	Thurston County \$2.72 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=110033329">https://web.pdc.wa.gov/rptimg/default.aspx?repno=110033329</a>
100955358	C4	100951126	12/1/2019	12/31/2019	1/10/2020	1/30/2020	20	Thurston County \$4,169.83 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100955358">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100955358</a>
100926281	C3	100908208	5/18/2019		6/10/2019	8/26/2019	77	Thurston County \$5,736.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100926281</a>
100885149	C4	100884102	1/1/2019	1/31/2019	2/11/2019	2/13/2019	2	Thurston County \$11,650.51 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100885149">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100885149</a>
100875683	C3	0	11/1/2018		11/5/2018	12/8/2018	33	Thurston County \$16.34 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100875683">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100875683</a>
100875686	C3	0	11/1/2018		11/5/2018	12/8/2018	33	Thurston County \$0.10 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100875686">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100875686</a>
100876867	C4	100870417	10/16/2018	10/29/2018	10/30/2018	12/10/2018	41	Thurston County \$22,113.76 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876867">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876867</a>
100876850	C4	100866334	9/1/2018	10/15/2018	10/16/2018	12/10/2018	55	Thurston County \$46,410.02 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876850</a>
100927008	C3	100859583	9/12/2018		9/17/2018	8/31/2019	348	Thurston County \$10,128.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100927008</a>
100876805	C4	100858678	7/31/2018	8/31/2018	9/10/2018	12/10/2018	91	Thurston County \$42,242.84 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876805">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100876805</a>
100858678	C4	0	7/31/2018	8/31/2018	9/10/2018	9/11/2018	1	Thurston County \$0.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100858678">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100858678</a>
100855516	C3	100854370	8/26/2018		8/27/2018	9/2/2018	6	Thurston County \$230.00 Democrats (WA) (TCD)	<a href="https://web.pdc.wa.gov/rptimg/default.aspx?repno=100855516">https://web.pdc.wa.gov/rptimg/default.aspx?repno=100855516</a>

- EXPEDITE
- No Hearing Set
- Trial is Set

Date: Monday, July 9, 2018  
Time: 8:30 a.m.

Judge Christopher Lanese

**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,  
  
Plaintiff,  
  
v.  
  
THURSTON COUNTY  
DEMOCRATIC CENTRAL  
COMMITTEE, a Washington nonprofit  
corporation,  
  
Defendant.

NO. 17-2-00972-34  
  
THIRD AMENDED COMPLAINT  
FOR CIVIL PENALTIES AND FOR  
INJUNCTIVE RELIEF FOR  
VIOLATIONS OF RCW 42.17A

**I. NATURE OF ACTION**

The State of Washington (State) brings this action to enforce the state’s campaign finance and disclosure law, RCW 42.17A. The State alleges that Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, violated provisions of RCW 42.17A by failing to timely disclose contributions and expenditures in filings with the Public Disclosure Commission. The State seeks relief under RCW 42.17A.750 and .765, including civil penalties, costs and fees, and injunctive relief.

**II. PARTIES**

2.1 Plaintiff is the State of Washington. Acting through the Washington State Attorney General, a local prosecuting attorney, or the Public Disclosure Commission, the State enforces the state campaign finance disclosure laws contained in RCW 42.17A.

1           2.2     Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE  
2 (Thurston County Democrats) is registered as a Washington nonprofit corporation. As the term  
3 is used under RCW 42.17A.005(6)(c), it is the county central committee for the Washington  
4 State Democratic Party in Thurston County, Washington.

5                                   **III.        JURISDICTION AND VENUE**

6           3.1     This Court has subject matter jurisdiction over the present case, in accordance  
7 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to  
8 RCW 42.17A.765.

9           3.2     This Court has personal jurisdiction over the Thurston County Democrats, a  
10 Washington nonprofit corporation with active membership and representatives in the State of  
11 Washington, and with its headquarters located in Olympia, Washington. Additionally, the acts  
12 and omissions complained of here took place in Thurston County.

13           3.3     Venue is proper in this Court pursuant to RCW 4.12.020(1).

14                                   **IV.        FACTUAL ALLEGATIONS**

15           4.1     RCW 42.17A declares as a matter of public policy “[t]hat political campaign  
16 and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is  
17 to be avoided.” RCW 42.17A.001(1). The statute further provides that the state’s campaign  
18 finance and disclosure law “shall be liberally construed to promote complete disclosure of all  
19 information respecting the financing of political campaigns.”

20           4.2     Washington’s campaign finance law requires political committees to timely  
21 report contributions received, including in-kind contributions. The information required to be  
22 disclosed includes the name and address of the source of contributions that exceed \$25 in the  
23 aggregate, and the employer and occupation of any individual contributor giving more than  
24 \$100 in the aggregate. RCW 42.17A.235, .240; WAC 390-16-037. Contribution disclosures are  
25 reported on a Public Disclosure Commission form “C-3” which is called the “Cash Receipt  
26 Monetary Contributions” form.

1 4.3 Washington's campaign finance law also requires political committees to timely  
2 report expenditures related to state campaigns, including any debts incurred by the political  
3 committee. RCW 42.17A.235, .240(8); RCW 42.17A.005(20). The PDC form to report  
4 expenditures is called a "Summary, Full Report Receipts and Expenditures" and is a form  
5 "C-4." An expenditure is defined to include "a *promise to pay*, . . . . For the purposes of this  
6 chapter, agreements to make expenditures, contracts, and promises to pay may be reported as  
7 estimated obligations until actual payment is made." RCW 42.17A.005(20).

8 4.4 The Thurston County Democrats is a political committee as the term is used in  
9 RCW 42.17A, and is more specifically a county central committee of the Democratic Party. As  
10 such, the Thurston County Democrats routinely raises funds in order to support various  
11 Democratic candidates and ballot propositions. From 2015 through 2018, the Thurston County  
12 Democrats received contributions and made expenditures, all of which should have been  
13 reported in accordance with RCW 42.17A.

14 Late Disclosed Contributions

15 4.5 The Thurston County Democrats failed to timely disclose all of its contributions  
16 as required by law. For example, on September 2, 2016, the Thurston County Democrats filed  
17 an amended C-4 report disclosing a \$1,250 in-kind contribution dated July 11, 2016 from Walt  
18 Bowen for sound systems for the Democratic Party convention. The filing amended the  
19 Thurston County Democrats' C-4 report filed July 11, 2016, for the reporting period from June  
20 1, 2016 through and including July 11, 2016 which did not disclose this information. Thus, the  
21 disclosure was made 52 days late.

22 4.6 The Thurston County Democrats also failed to timely disclose other  
23 contributions it received during the election years 2015, 2016, 2017, and 2018.

24 Late Disclosed Expenditures

25 4.7 The Thurston County Democrats failed to timely disclose all of their  
26 expenditures as required by law during election years 2015, 2016, 2017, and 2018. Examples

1 of these untimely disclosures include:

2 a. On September 2, 2016, the Thurston County Democrats filed an amended C-4  
3 report for the April 1 through April 30, 2016 reporting period. The amended C-4 report  
4 disclosed three expenditures totaling \$1,131, which should have been reported May 10, 2016.  
5 These disclosures were therefore reported 115 days late each.

6 b. On September 2, 2016, the Thurston County Democrats filed an amended C-4  
7 report for the May 1 through May 31, 2016 reporting period. The amended C-4 report  
8 disclosed four expenditures totaling \$1,571, which should have been reported by  
9 June 10, 2016. These disclosures were therefore reported 84 days late each.

10 c. Also on September 2, 2016, the Thurston County Democrats filed an amended  
11 C-4 report for the reporting period of June 1 through July 11, 2016. On that report, they  
12 disclosed \$5,672.62 in expenditures which should have been disclosed on July 12, 2016;  
13 therefore, the expenditures were disclosed at least 52 days late.

14 d. On September 2, 2016, the Thurston County Democrats disclosed \$12.01 in  
15 unitemized expenditures of \$50 or less, which should have been reported in their C-4 report  
16 due July 26, 2016; thus, this disclosure was 38 days late.

17 e. On November 4, 2016, the Thurston County Democrats filed an amended C-4  
18 report for the reporting period of October 18 through October 31, 2016. On that report, they  
19 disclosed a contribution they had made to the Hoffman campaign on October 24, 2016, which  
20 should have been reported by November 1, 2016. This disclosure was three days late.

21 f. On November 18, 2016, the Thurston County Democrats filed an amended C-4  
22 report for the reporting period of October 18 through October 31, 2016. On that report, they  
23 disclosed an expenditure made to Verizon Wireless for \$86.79 (dated October 29, 2016), which  
24 should have been reported on November 1, 2016. This payment was disclosed 17 days late.

25 g. On February 9, 2017, the Thurston County Democrats filed an amended C-4  
26 report for the reporting period of March 1 through March 31, 2016. On that report, they

1 disclosed \$6,782 in expenditures made (six different expenditures), which should have been  
2 reported on April 11, 2016. These disclosures were reported 304 days late each.

3 h. Also on February 9, 2017, the Thurston County Democrats filed an amended  
4 C-4 report for the reporting period of April 1 through April 30, 2016. On that report, they  
5 disclosed two expenditures totaling \$4,757 which should have been reported on May 10, 2016.  
6 These expenditures were reported 275 days late each.

7 i. On April 19, 2017, the Thurston County Democrats filed an amended C-4 report  
8 for the period of January 1 through January 31, 2017. On the amended report, they disclosed a  
9 payment for a brunch event dated January 5, 2017, in the amount of \$1,663.42, to River's Edge  
10 restaurant. This expenditure should have been reported on its C-4 report due on February 10,  
11 2017. This disclosure was reported 68 days late.

12 Late Reported Debts and Obligations

13 4.8 The Thurston County Democrats failed to timely disclose debts and obligations  
14 incurred during 2016, 2017, and 2018. For example, the state Democratic Party caucuses took  
15 place in the early spring of 2016. The Thurston County Democrats arranged to pay for meeting  
16 space for caucus activity to take place on March 26, 2016. They ultimately disclosed payment  
17 of \$4,826.63 to rent meeting space for the party caucuses. These disclosures were made on July  
18 11, 2016 (\$2,075 worth of rental expenses), and September 2, 2016 (\$2,751.63 worth of rental  
19 expenses). On information and belief, these disclosures should have been made as debts or  
20 orders placed no later than April 10, 2016, the next reporting date from the date of the  
21 caucuses. As such, these disclosures were at least 92 days late.

22 4.9 In January 2017, the Thurston County Democrats incurred a debt/obligation in  
23 excess of \$250 when it reserved the River's Edge restaurant for a February 25, 2017 brunch  
24 event. On information and belief, the Thurston County Democrats made the brunch reservation  
25 on or around January 5, 2017 and paid the River's Edge \$1,663.42. It then reported paying the  
26 balance of the obligation (\$1,663.42) on February 25, 2017 by disclosing this information on

1 its C-4 report filed on March 10, 2017. The Thurston County Democrats should have reported  
2 this remaining debt and obligation to the River's Edge on its C-4 report due on February 10,  
3 2017. As such, this disclosure is at least 30 days late.

4 4.10 In August 2017, the Thurston County Democrats incurred a debt/obligation of  
5 over \$50 to Jerry's Towing for towing services that was reported late.

6 Late Amended Political Committee Registration

7 4.11. The Thurston County Democrats failed to timely file its amended C-1pc  
8 registration form after electing a new chair on June 6, 2017.

9 **V. CLAIMS**

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

12 5.1 First Claim: Plaintiff reasserts the factual allegations made above and further  
13 asserts that Defendant, in violation of RCW 42.17A.235, failed to timely disclose contributions  
14 it received to the Public Disclosure Commission.

15 5.2 Second Claim: Plaintiff reasserts the factual allegations made above and further  
16 asserts that Defendant, in violation of RCW 42.17A.235, failed to timely disclose its  
17 expenditures, including but not limited to debts and obligations, to the Public Disclosure  
18 Commission.

19 **VI. REQUEST FOR RELIEF**

20 WHEREFORE, Plaintiff requests the following relief as provided by law:

21 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,  
22 including but not limited to imposition of a civil penalty, all to be determined at trial;

23 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as  
24 authorized by RCW 42.17A.765(5);

25 6.3 For temporary and permanent injunctive relief, as authorized by RCW  
26 42.17A.750(1)(h); and



1 **PROOF OF SERVICE**

2 I certify that, pursuant to the agreement of the parties regarding electronic service of  
3 documents in this case and the Defendant's agreement to accept service of this Third Amended  
4 Complaint by electronic service, I served a copy of this document today on:

5 Taki Flevaris  
6 Greg Wong  
7 Pacifica Law Group  
8 Attorneys for Defendant  
9 taki.flevaris@pacificallawgroup.com  
10 greg.wong@pacificallawgroup.com  
11 tricia.okonek@pacificallawgroup.com  
12 dawn.taylor@pacificallawgroup.com

13 I certify under penalty of perjury under the laws of the state of Washington that the  
14 foregoing is true and correct.

15 DATED this 8th day of May, 2018, at Olympia, Washington.

16   
17 \_\_\_\_\_  
18 LINDA A. DALTON

1  EXPEDITE  
2  No Hearing Set  
3  Trial is Set  
4 Date: Monday, July 9, 2018  
5 Time: 8:30 a.m.  
6 Judge Christopher Lanese

**FILED**

JUN 15 2010

Superior Court  
Linda Myhre Ertow  
Thurston County Clerk

7 **STATE OF WASHINGTON**  
8 **THURSTON COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 THURSTON COUNTY  
13 DEMOCRATIC CENTRAL  
14 COMMITTEE, a Washington nonprofit  
15 corporation,

16 Defendant.

NO. 17-2-00972-34

STIPULATION AND AGREED  
JUDGMENT

**EX PARTE**

17 **JUDGMENT SUMMARY (RCW 4.64.030)**

- 18 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
- 19 B. JUDGMENT DEBTOR: THURSTON COUNTY DEMOCRATIC CENTRAL  
20 COMMITTEE, a Washington nonprofit corporation
- 21 C. PRINCIPAL JUDGMENT: \$16,686 with \$8,343 suspended for a period of four years  
22 contingent on no findings of violations of the law  
23 committed during the period of suspension as described  
24 in the Stipulation and Judgment below
- 25 D. INTEREST: No prejudgment interest is owed. Principal judgment  
26 amount(s) due and owing shall not bear interest unless  
the principal judgment is unpaid by the due date specified  
herein
- E. COSTS AND FEES: \$8,000 as attorneys fees, \$240 as court costs, and \$2,500  
as costs of investigation
- F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON  
Attorney General  
LINDA A. DALTON, WSBA No. 15467

STIPULATION AND  
AGREED JUDGMENT

1

ATTORNEY GENERAL OF WASHINGTON  
Campaign Finance Unit  
PO Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200

1 Senior Assistant Attorney General  
2 S. TODD SIPE, WSBA No. 23203  
Assistant Attorney General

3 G. ATTORNEY FOR TAKI FLEVARIS, WSBA No. 42555  
4 JUDGMENT DEBTOR: PACIFICA LAW GROUP LLP

5 **STIPULATION**

6 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and  
7 Defendant, THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a  
8 Washington nonprofit corporation, desiring to resolve all claims arising out of the State's Third  
9 Amended Complaint and made in citizen action notices received by the Attorney General's  
10 Office since January 3, 2017 to the execution of the Stipulation, hereby enter into the following  
11 stipulation:

- 12 1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a  
13 Washington nonprofit corporation, agrees to pay an assessed civil penalty in the amount of  
14 \$16,686 for the violations of RCW 42.17A outlined in the State's Third Amended  
15 Complaint.
- 16 2. The parties agree that \$8,343 of the assessed civil penalty will be suspended based on the  
17 following terms and conditions:
- 18 a. The suspension will be in effect for four years from the date of execution of the  
19 Judgment. During the period of suspension, Defendant THURSTON COUNTY  
20 DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation,  
21 agrees that it will comply with RCW 42.17A.
- 22 b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL  
23 COMMITTEE, a Washington nonprofit corporation, is found by the Public Disclosure  
24 Commission following an adjudicative proceeding or a court to have committed a  
25 violation of RCW 42.17A during the suspension period, the suspended penalty of  
26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

\$8,343 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission following an adjudicative proceeding or a court for conduct during the suspension period, then the suspended portion of the penalty will be set aside without further intervention of the Court.

3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, agrees to pay the State the total amount of \$10,740 as reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500) in this action.

4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, agrees to pay the State the unsuspended portion of the civil penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15, and then installments of \$1500 on December 1 and June 1 each year starting on December 1, 2018 until paid in full. In the absence of extenuating circumstances, the failure to timely make any installment will result in the remainder of the unpaid portion to be due within 30 days of the missed installment.

DATED this 14 day of June, 2018.

ROBERT W. FERGUSON  
Attorney General

PACIFICA LAW GROUP LLP



LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
S. TODD SIPE, WSBA No. 23203  
Assistant Attorney General  
Attorneys for Plaintiff

TAKI FLEVARIS, WSBA No. 42555  
Attorneys for Defendants

JUDGMENT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant Attorney General, and S. TODD SIPE, Assistant Attorney General, and Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, appearing through its attorney, TAKI FLEVARIS of the Pacifica Law Group LLP, apprised the Court of their agreement to the entry of this judgment for the purpose of settling and compromising this action brought under RCW 42.17A. The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised, hereby ORDERS as follows:

- 1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, is hereby assessed a civil penalty in the amount of \$16,686 payable to the State of Washington for its violations of the provisions of RCW 42.17A as outlined in the Stipulation.
- 2. The amount of \$8,343 of the assessed penalty is hereby suspended upon Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation's compliance with the following court-ordered conditions:
  - a. The suspension will be in effect for four years from the date of execution of the Judgment. During the period of suspension, Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation shall comply with RCW 42.17A.
  - b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation is found by the Public Disclosure Commission following an adjudicative proceeding or a court to have committed a violation of RCW 42.17A, the suspended penalty of \$8,343 shall immediately become

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

due and payable within 30 days of such finding without further intervention of the Court.

c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation is not found to have committed violations of RCW 42.17A by the Public Disclosure Commission following an adjudicative proceeding or a court for conduct during the suspension period, then the suspended portion of the penalty shall be set aside without further intervention of the Court.

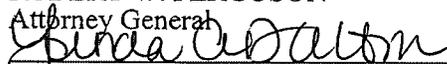
3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, shall pay the State the total amount of \$10,740 as reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500) in this action.

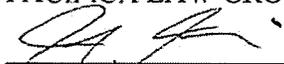
4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation, shall pay the State the unsuspended portion of the civil penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15, 2018, and then installments of \$1,500 on December 1 and June 1 each year starting on December 1, 2018 until paid in full. In the absence of extenuating circumstances, the failure to timely make any installment shall result in the remainder of the unpaid portion to be due within 30 days of the missed installment.

DONE IN OPEN COURT this 15 day of June, 2018.

**CHRISTOPHER LANESE**

\_\_\_\_\_  
JUDGE CHRISTOPHER LANESE

Presented by:  
ROBERT W. FERGUSON  
Attorney General  
  
LINDA A. DALTON, WSBA No. 15467  
Senior Assistant Attorney General  
S. TODD SIPE, WSBA No. 23203  
Assistant Attorney General  
Attorneys for Plaintiff State of Washington

PACIFICA LAW GROUP LLP  
  
TAKI FLEVARIS, WSBA No. 42555  
Attorneys for Defendant