Respondent Name

Pierce County Democratic Central Committee

Complainant Name

Glen Morgan

Complaint Description

<u>Glen Morgan</u> reported via the portal (Fri, 18 Aug 2023 at 9:35 PM)

To whom it may concern,

It has come to my attention, once again, as it frequently has in the past, that the Pierce County Democrats, as they are inclined to do, have violated Washington State's campaign finance laws (**RCW 42.17A**). The specific violations are detailed below:

1) Attempting to conceal the truth about political activity from the public by waiting weeks, months, or more to report what they did or who funded them (Violation RCW 42.17A.235, RCW 42.17A.240)

I realize this allegation doesn't surprise anyone who has paid any attention to this shady and prolific law-breakingking crew over the past few years. This crew was caught breaking this exact law last time (PDC Enforcement Case #46474 and was formally sanctioned with a Warning Letter at the time – See attached Warning Letter and original complaint I filed against this crew in early 2019, and also PDC Enforcement Case #44695, for which they also received a Warning Letter, and PDC Enforcement Case #18611, which triggered an AG lawsuit and settlement of \$38,520 – See Thurston Superior Court #17-2-04616-34, also attached for Staff Reference). Of course This group apparently enjoys breaking the law, so I thought I would revisit their activities once again and help the PDC address this troubled group and their wayward ways.

First, let's just review the late reporting, which is essentially an effort by this secretive, repetitively lawbreaking PAC to conceal the truth from the public for as long as they believe they can. Even a casual review of this crew's history shows they do this all the time, I've caught them multiple times and filed complaints multiple times, and the State Attorney General even sued them for this lawbreaking, but they can't seem to help themselves.

As usual, when I'm revisiting the frequent lawbreaker club, and the Pierce County Democrats are at the top of this list, I try to provide the specific examples of lawbreaking in a very easy-to-read and simpler to understand spreadsheet format. This is both for PDC staff convenience, but it also helps the lawbreakers use the list as a reference sheet so that they can go back and try to explain, justify, or excuse their repetitive lawbreaking activities. I've attached this both as an Excel file and a PDF so that everyone involved can get the optimal value from the effort. Please note that the original report referenced in the spreadsheet can be linked by clicking on the far-right column. I believe this makes it easier for everyone.

A quick note again on how this report is organized. I've **organized it by latest report first.** You'll note that the latest report filed by this group was 517 days late – which is pretty late.

I've color coded the most extreme late reports, of which there are 24. I've color coded the problematically late orange, and there are only 7 of those 14-6 days late. Illegal, but not as egregious as most of them. I've color coded the sloppily late reports yellow, and there are only 10 of those. I also want to note, I've highlighted in yellow the late reports which were filed AFTER the last warning letter was sent to this group. Obviously, they didn't take the many warning letters from the PDC very seriously

and instead they decided to just keep breaking the law like the warning letters and AG lawsuit never happened.

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.

For both staff and the lawbreaker's reference, I will detail just a few of the many 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 #1, #2- Multiple In-Kind Contributions were made one for "picnic donation" for \$75.00 and another for "food for picnic" for \$150 (PDC Report #110044563, attached for staff reference), the address for the vendor where generous in-kind contributors Ericka Buckley and Kathy Orlando purchased the goods is not provided, despite the crystal-clear legal requirement to do so. Another odd thing is the perfectly rounded numbers here would indicate a lack of receipts and accuracy. This is a real problem for this PAC.
- Violation Example #3 On PDC Report #101011283, attached for staff reference, this group claims they received an in-kind contribution valued at \$360 from the Washington State Democratic Party. Of course, according to WAC 390-16-037, Example B, this PAC must report how many signs (and signs for who?) plus they are clearly required to report where these signs originally came from the vendor as the PDC so clearly requires.
- **Violation Example #4, #5, #6** On PDC Report #110127829, attached for staff reference, this PAC claims they received three different in-kind contributions, none of which provide the true source of

the items donated – including name of the vendor, and address. A clear series of violations documented here.

There are numerous other examples of this failure to follow the law with most of the in-kind contributions this PAC has reported, but fortunately, this PAC can easily go back and correct these reports to get back to at least a pretense of compliance.

The Pierce County Democrats – a Study of an addiction to lawbreaking and how some people will never learn – no matter how many breaks they get

In many ways, the Pierce County Democrats are one of the most prolific violators of Washington State's campaign finance laws in the last 8 years at least. The Spokane County Democrats might be the only crew more out of control, but Pierce County certainly can hold their own in the lawbreaking sweepstakes.

First, I filed my first PDC complaint against this group in 2017 (attached for staff reference), which became PDC Enforcement Case #18611. I documented so many late reports, so much information concealed from the public, and such a massive pattern of deception and dishonesty, this forced the Washington State Attorney General to file a lawsuit against the Pierce County Democrats (also attached for staff reference, and since the PDC claims they don't have access to this original document, it can be added to the case file for 18611 or the AG lawsuit case file on the PDC's Enforcement Case list). In the end, this \$38,520 friendly settlement was given the most favorable terms possible by Washington State Attorney General Bob Ferguson. I will note for the record that the attorney for the Pierce County Democrats was the recently resigned Executive Director of the Public Disclosure Commission – Evelyn Lopez (you can see her signature on the final settlement document when she signed on behalf of the Pierce County Democrats). The most unique aspect of this settlement was the fact that for the first time in state history, since the campaign finance laws were approved by citizens initiative in 1972, the Attorney General approved a payment plan for the judgement with this group. The AG later settled cases in the same way with similar payment plans, but the Pierce County Democrats were first.

If that was all, this trip down memory lane would end now, but of course, it isn't. The Pierce County Democrats immediately started breaking the same laws again after the AG settlement and while they were still making their regular payments on the original fine. I caught them filing late reports again and again (just like now), and this became **PDC Enforcement Case #46474** and I also caught them failing to update their C1PC documents (which became **PDC Enforcement Case #44695**). Despite violating the law, repeatedly during their probationary period from the AG, **this PAC was able to skate by with just a few Warning Letters** issued by the PDC for their continuing lawbreaking (I've attached this for PDC staff reference).

Clearly, lawbreaking is a way of life for the Pierce County Democrats and with no consequences for breaking the law – why not? I'll just continue to do my best to document it all so that the public can be aware of this pattern of behavior.

Let me know if you need any more details on this report, and PDC staff is welcome to post up the original settlement documents from **Thurston County Superior Court Case #17-2-04616-34**, **which I have attached for reference.** If this helps complete some missing information on the PDC Enforcement lists, then I'm happy to help with that as well.

Best Regards,

Glen Morgan

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

Particularly when the public is reviewing a local political group like this one which has a long and storied history of breaking the law, the public has a right to know if this crew is even pretending to comply with the law at all anymore. While it appears this group has fallen off the wagon again and gone back to their longstanding lawbreaking ways, the public should expect to see what happens to those who continuously break the law. It is bad enough that shoplifters and car thieves get away with it, but will political committees like this one escape justice as well?

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

All clearly referenced, and attached

List of potential witnesses

Anyone at this committee is probably complicit at this point. Probably a good idea to subpoen bank records to see if they are even close to the reports filed by this group.

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

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

Pierce County Democratic Central Committee (PCDCC)
Pierce County Democratic Central Committee P.O. Box 110971
Tacoma, WA 98411

Coverage: 11/01/2022 to 11/30/2022

Final report: No

Report number: 110127829

Reporting year: 2022

Date submitted: 12/04/2022

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$9,144.83
2. Cash received (Schedule A line 1).	\$662.97	
3. In-kind contributions received (Line 1 schedule B).	\$116.60	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$779.57
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).		\$9,924.40
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).		\$5,572.23
11. Cash expenditures (Line 3 schedule A).	\$860.03	
12. In-kind expenditures (Line 1 schedule B).	\$116.60	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$976.63
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).		\$6,548.86
CASH SUMMARY		
18. Cash on hand (Lines 8 - 17)		\$3,375.54
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)		\$3,375.54

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

Treasurer's name and date

Shawn Cole - 12/04/2022

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
11/03/2022	\$55.00	11/16/2022	\$61.67	11/21/2022	\$27.00
11/14/2022	\$15.00	11/18/2022	\$0.30	11/23/2022	\$15.00
11/15/2022	\$10.00	11/19/2022	\$479.00		

2. TOTAL CASH RECEIPTS (LINE 2 OF C4):

\$662.97

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Cash
N/A	Expenses	Non-itemized expenditures	\$92.39
11/05/2022	MCNALLY MANAGEMENT 7512 STANICH LANE #5, GIG HARBOR, WA 98335	Utilities, phone, and other overhead costs: Hall rental	\$100.00
11/16/2022	KNUTSEN INSURANCE 968 COMMERCIAL STREET, ASTORIA, OR 97103	Utilities, phone, and other overhead costs: Insurance premium	\$505.40
11/16/2022	ZOOM 55 ALMADEN BLVD STE 600 , SAN JOSE, CA 95113	Utilities, phone, and other overhead costs: Zoom subscription	\$55.15
11/19/2022	COSTCO 2219 S 37th Street , Tacoma, WA 98409	Meeting/fundraiser food	\$107.09

\$860.03

4. TOTAL EXPENDITURES:

\$860.03

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
11/19/2022	COLE SHAWN 1624 FIRLANDS DRIVE , TACOMA, WA 98405		Drinks for auction event	Fair market value: \$30.00 Aggregate total (N): \$30.00
11/19/2022	HARTLE SUSAN 7574 68TH AVE W , LAKEWOOD, WA 98499		Paper products for auction event	Fair market value: \$46.60 Aggregate total (N): \$73.60
11/19/2022	ORLANDO KATHY 3315 N CHEYENNE , TACOMA, WA 98407		Food for Auction event	Fair market value: \$40.00 Aggregate total (N): \$40.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 101011283

10-26-2020

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

Pierce County Democratic Central C	ommittee			
Mailing Address 3049 S 36th Street, Suite 206			City Tacoma, WA	
Zip + 4 Office Sought (Canal 98409	didates)	Election Date 2020		nucus Committees: During
Report Period From (last C-4) To (e	nd of period)	Final Report?	expenditure (i.e., an expens	e not considered a contribution)
Covered 10/13/20 10	/26/20	Yes No X	supporting or opposing a sta	te or local candidate?
RECEIPTS			*See next page	Yes No
 Previous total cash and in kind contributions (Fron (if beginning a new campaign or calendar year, se 	n line 8, last C-4) e instruction boo) bklet)		\$ \$18,038.99
2. Cash received (From line 2, Schedule A)			····· \$ \$179.07	-
3. In kind contributions received (From line 1, Sched			-	=
4. Total cash and in kind contributions received this p				•
5. Loan principal repayments made (From line 2, Sch			•	-
6. Corrections (From line 1 or 3, Schedule C)				-
7. Net adjustments this period (Combine line 5 & 6)				\$0.00
8. Total cash and in kind contributions during campa	gn (Combine lin	es 1, 4 & 7)		\$18,578.06
9. Total pledge payments due (From line 2, Schedule	e B)	\$0.00		
EXPENDITURES				
Previous total cash and in kind expenditures (Fron (If beginning a new campaign or calendar year, se	n line 17, last C- e instruction boo	4) oklet)		\$12,115.74
11. Total cash expenditures (From line 4, Schedule A)			\$0.00	<u>)</u>
12. In kind expenditures (goods & services) (From line	1, Schedule B)		\$360.00	n
13. Total cash and in kind expenditures made this per	od (Line 11 plus	s line 12)		\$360.00
14. Loan principal repayments made (From line 2, Sch	nedule L)		\$0.00	<u>)</u>
15. Corrections (From line 2 or 3, Schedule C)		Show + or	(-) \$0.00	<u>)</u>
16. Net adjustments this period (Combine lines 14 & 1	5)		Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campa	gn (Combine lin	es 10, 13 and 16)		\$12,475.74
CANDIDATES ONLY Name not	CASH SUMM	ARY		
Won Lost Unopposed on ballot			ance(s) plus your petty cash balance.]	\$6,102.32
Primary election				
General election	19. Liabilities:	(Sum of loans and de	ebts owed)	\$0.00
Treasurer's Daytime Telephone No.:	20. Balance (S	Surplus or deficit) (Line	e 18 minus line 19)	\$6,102.32
CERTIFICATION: I certify that the information herein and on	accompanying sch	nedules and attachments	is true and correct to the best of m	/ knowledge.
Candidate's Signature Date		Treasurer's Signatu		Date
		Shawn Cole		10/26/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

					10/13/20	10/26/20		
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		
10/16/2020	\$0.07	10/14/2020	\$15.00	10/23/2020	\$15.00			
10/15/2020	\$5.00	10/20/2020	\$75.00					
10/14/2020	\$54.00	10/21/2020	\$15.00					
2 TOTAL CASH RECE	IPTS			Enter al	so on line 2 of C4	\$ 6170 (

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:

- If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or 1) committee, identify the candidate or committee in the Description block;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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	A	mount
N/A	Expenses of \$50 or less	N/A	N/A		
			Total from attached pag	es \$	\$0.00

Enter also on line 11 of C4

\$0.00

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4 **B** (11/93)

3

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

Report Date

10/13/20 10/26/20

					,		, 20 20, 20, 20
1. IN KIND	CONTRIBUTIONS RECEIVED (goods, service	es, discounts, etc.)					
Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
.0/22/20	WASHINGTON STATE DEMOCRATIC 615 2ND AVE, SUITE 580 SEATTLE, WA 98104	Yard Signs	\$360.00	\$1,110.00			

TOTAL THIS PAGE

\$360.00



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 110044563

09-06-2021

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

Pierce County Democratic Central C	ommittee			
Mailing Address 3049 S 36th Street, Suite 206			City Tacoma, WA	
Zip + 4 Office Sought (Cana 98409	didates)	Election Date 2021		ucus Committees: During
Report Period From (last C-4) To (e	nd of period)	Final Report?	expenditure (i.e., an expense	e not considered a contribution)
Covered 07/27/21 08	3/31/21	Yes No X	supporting or opposing a stat	e or local candidate?
RECEIPTS			*See next page	Yes No
 Previous total cash and in kind contributions (Fron (if beginning a new campaign or calendar year, se 	n line 8, last C-4) e instruction boo) klet)		\$ \$6,154.57
2. Cash received (From line 2, Schedule A)				-
3. In kind contributions received (From line 1, Sched				
4. Total cash and in kind contributions received this p				\$1,614.96
5. Loan principal repayments made (From line 2, Sch			·	
6. Corrections (From line 1 or 3, Schedule C)		Show + or	(-) \$0.00	
7. Net adjustments this period (Combine line 5 & 6)			Show + or (-)	\$0.00
8. Total cash and in kind contributions during campa	ign (Combine line	es 1, 4 & 7)		\$7,769.53
9. Total pledge payments due (From line 2, Schedule	e B)	\$0.00		
EXPENDITURES				
Previous total cash and in kind expenditures (Fron (If beginning a new campaign or calendar year, se	n line 17, last C-4 e instruction boo	4) bklet)		\$4,528.59
11. Total cash expenditures (From line 4, Schedule A)			····· \$591 . 56	İ
12. In kind expenditures (goods & services) (From line	e 1, Schedule B)		\$225.00	1
13. Total cash and in kind expenditures made this per	iod (Line 11 plus	line 12)		\$816.56
14. Loan principal repayments made (From line 2, Sch	nedule L)		\$0.00	<u>.</u>
15. Corrections (From line 2 or 3, Schedule C)		Show + or	(-) \$0.00	<u>.</u>
16. Net adjustments this period (Combine lines 14 & 1	5)		Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campa	ign (Combine lin	es 10, 13 and 16)		\$5,345.15
CANDIDATES ONLY Name not	CASH SUMM		>	40 404 20
Won Lost Unopposed on ballot			17)ance(s) plus your petty cash balance.]	\$2,424.38
Primary election				
General election	19. Liabilities:	(Sum of loans and de	ebts owed)	\$0.00
Treasurer's Daytime Telephone No.:	20. Balance (S	Surplus or deficit) (Line	e 18 minus line 19)	\$2,424.38
CERTIFICATION: I certify that the information herein and on	accompanying sch	nedules and attachments	is true and correct to the hest of my	knowledge
Candidate's Signature Date		Treasurer's Signatu		Date
		Shawn Cole		09/06/21

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

07/27/21 08/31/21 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 08/09/2021 \$30.00 08/17/2021 \$537.00 08/20/2021 \$0.02 08/23/2021 08/11/2021 \$42.00 08/18/2021 \$5.00 \$5.00 08/16/2021 \$527.00 08/19/2021 \$127.00 See attached \$ 2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$1,389.96

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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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..
- 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	\$36.41
08/02/21	MCNALLY MANAGEMENT 7512 STANICH LN#5 GIG HARBOR, WA 98335	G	August Rent	\$334.75
08/23/21	ZOOM 55 Almaden Blvd Ste 600 San Jose, CA 95113	G	Paid to CASSANDRA BROWN. Zoom Membership shared with 29th LD	\$220.40
			Total from attached pages	\$ \$0.00

\$

Enter also on line 11 of C4

\$591.56

Attachment to Schedule A Additional Deposits

Name

for the period: 07/27/21 08/31/21 3

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
08/25/21 08/30/21	\$15.00 \$101.94				
00, 00, ==	4-0-00-				

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4 **B**(11/93)

4

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

Report Date

07/27/21 08/31/21

I. I	N KIND	CONT	RIBUT	IONS	RECEIVED	(goods,	services,	discounts,	etc.)
------	--------	------	-------	------	----------	---------	-----------	------------	-------

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
8/16/21	ERICA BUCKLEY 2825 Milton Way #934 Milton, WA 98354	Picnic donation	\$75.00	\$75.00			
8/19/21	KATHY ORLANDO 3315 N CHEYENNE TACOMA, WA 98407	Food for picnic	\$150.00	\$150.00	RF	ETT	RED
		TOTAL THIS PAGE	\$225.00		<u> </u>		

Penalties

Total penalties: \$38,520

Balance Due: \$0

Pierce County Democratic Central Committee

Penalty

\$38,520 (\$31,780 with \$15,890 suspended. Costs & Earny; Fees: \$5,000 in attorney fees; \$1,500 in investigation costs, and \$240 in court costs (Paid to State). & Quot; agrees to pay the State the unsuspended portion of the civil penalty (\$15,890) and fees and costs (\$6,740) in installments of \$3,000 on January 1 and July 1 each year starting in 2018 until paid in full.)

Suspended

\$15,890 (\$15,890 suspended for a period of 4 years contingent on no findings of violations of RCW 42.17A committed during the period of suspension.)

Payments

\$3,000 on 12/13/2018 (Scheduled Payment - Paid)

\$3,000 on 05/22/2019 (Scheduled Payment - Paid)

\$3,000 on 12/10/2019 (Scheduled Payment - Paid)

\$3,000 on 06/24/2020 (Scheduled Payment - Paid)

\$3,465 on 12/17/2020 (Scheduled Payment - Paid)

\$3,000 on 01/01/2018 (Scheduled Payment - Paid AG)

\$3,000 on 07/01/2018 (Scheduled Payment - Paid AG)

\$1,165 on 04/29/2021 (PAID)



State of Washington PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 (360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

January 20, 2019

Delivered electronically to Rick Offner, Treasurer for Pierce County Democratic Central Committee at "pcdemsinfo@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Cases 42704 & 44695

Dear Rick Offner:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning failure to timely and accurately file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities and failure to timely file an amended Committee Registration (C-1pc report) disclosing material changes. Staff expects you to timely file accurate and complete C-3, C-4 and C-1pc reports in future years in accordance with PDC laws and rules. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at jennifer.hansen@pdc.wa.gov.

Sincerely,
/s
Jennifer Hansen
Compliance Officer
Endorsed by,
Peter Lavallee
Executive Director



State of Washington PUBLIC DISCLOSURE COMMISSION

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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

January 20, 2019

Delivered electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint regarding Pierce County Democratic Central Committee, PDC Cases 42704 & 44695

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on October 23, 2018 and January 3, 2019. Your complaints alleged that the Pierce County Democratic Central Committee (PCDCC), a bona fide political party committee may have violated: (1) RCW 42.17A.235 and .240 by failing to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; and (2) RCW 42.17A.205 by failing to timely file an amended Committee Registration (C-1pc report) within ten days disclosing any material change in the committee information.

PDC staff reviewed the allegations listed in the two complaints you filed; the applicable statutes, rules, and reporting requirements; the response provided by Dominick Bergeron, former Treasurer for Pierce County Democratic Central Committee; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- On September 10, 2018, Pierce County Democratic Central Committee (Committee) filed an amended C-1pc report as a Continuing Bona Fide Political Party Committee selecting the "Full Reporting" option and listing Tim Farrell as Chair and Committee Manager, Dominick Bergeron as Committee Treasurer, Angel Swanson as Vice-Chair, and Patricia Dailey as Secretary.
- On January 7, 2019, PCDCC filed an amended C-1pc report listing Kathy Orlando as Chair and Committee Manager, Rick Offner as Committee Treasurer, Eric Herde as Vice-Chair, and Diane Sandowski as Secretary.

Summary of PDC Case 42704

• Staff's review of the spreadsheet attached to the complaint alleging late filed C-3 and C-4 reports, is broken down as follows:

- 1. The Committee submitted 22 initially filed C-3 reports, and seven amended C-3 reports; and six initially filed C-4 reports, and 16 amended C-4 reports.
- 2. The majority of the alleged late filed C-3 and C-4 reports filed by the Committee included both initially and amended C-3 and C-4 reports covered the period of December 8, 2016 through October 23, 2018.
- 3. Staff believes that the allegations concerning those late filed reports are covered by the Settlement agreement that was entered into between the PCDCC and the Attorney General's Office (AGO) and are not subject to additional state action by the PDC for both Pre and Post passage of 2938.
- **4.** Staff's review of the remaining C-3 and C-4 reports, and the response from PCDCC, found that eight of the alleged late filed C-3 and C-4 reports were submitted as amendments to correct previously disclosed information that had been discovered during an internal audit conducted by PCDCC.
- **5.** Some of the amended filings only reflected changes in the aggregate totals due to corrections and amendments made to previous reports.
- **6.** Ten of the alleged late filed C-3 and C-4 reports involved technical issues requiring assistance from PDC Staff in order to complete the filing, and the late filed reports disclosed mostly small contributors and proceeds from low-cost fundraisers and committee expenditures for rent.
- In his response, Treasurer Dominick Bergeron, stated that errors occurring after the date of the settlement referenced above, were "minor technical errors, which were communicated to the PDC at the time, insignificant in amount or impact on any campaign outcome, or just minor human error." In addition, he described the high turnover rate with committee treasurers which he stated is partially due to "the anxiety associated with the zero-tolerance provision of the settlement."
- Staff's review found three of the alleged filed C-3 and C-4 reports were filed without having any relevant mitigating factors or circumstances and included one C-4 reports that disclosed \$193.65 in expenditures for insurance and internet and two C-3 reports that disclosed \$666.97 in proceeds from a low-cost fundraising event and two individual donations totaling \$140. The C-3 and C-4 reports were filed between five and twelve days late.

Summary of PDC Case 44695

- The complaint included a December 9, 2018 announcement posted by the newly elected Chair, Kathy Orlando, on the Pierce County Democrats Facebook page entitled "your new PCDCC officers" as evidence of the allegation regarding failure to file an amendment to the C-1pc within ten days as required by law.
- On January 7, 2019, the Committee filed an amended C-1pc report disclosing the newly elected Committee officers for 2019 including the Chair, Vice-Chair, Treasurer and Secretary. The amended C-1pc report was filed 15 days late.

Based on staff's review, the alleged late and incomplete filed C-3 and C-4 reports cited in the two complaints were primarily caused by a Committee reorganization and changes in officers, but we noted that the Committee implemented additional internal controls to ensure compliance by creating an oversight committee, by conducting an internal audit, and additional training.

These steps were taken, in part, by the Pierce County Democratic Central Committee to comply with the provisions of the settlement agreement.

Based on these findings staff has determined that, in this instance, failure to timely and accurately file 19 filed C-3 and C-4 reports, including amendments, mostly disclosed little monetary activity, or were filed as a result of an internal audit process conducted by PCDCC, and therefore does not warrant further investigation or enforcement action.

Pursuant to WAC 390-37-060(1)(b), the PCDCC will receive a formal written warning concerning failure to timely and accurately file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities and failure to timely file an amended Committee Registration (C-1pc report) disclosing material changes. The formal written warning will include staff's expectation that PCDCC timely file accurate and complete C-3, C-4 and C-1pc reports in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,
/ _S
Jennifer Hansen
Compliance Officer
Endorsed by,
/s
Peter Lavallee
Executive Director

cc: Pierce County Democratic Central Committee

To Whom it May Concern -

It has come to my attention that the Pierce County Democratic Central Committee has violated multiple provisions of **RCW 42.17A.**

1) Failure to timely file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate, and timely reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, the Pierce County Democratic Central Committee failed on numerous occasions to do this. Additionally, they may have failed to timely deposit contributions within 5 business days. Please see Exhibit A "Illegal Late Reported/Deposited Contributions by Pierce County Democrats" and Exhibit B "Illegally Late Reported Expenditures by Pierce County Democrats"

Additionally, the Pierce County Democratic Party has **failed to submit a single contribution (C3) or expenditure (C4) report in 2017**, despite having received many contributions and making many expenditures during the relevant time period. This needs to be corrected immediately.

There are numerous irregularities on the Pierce County Democratic Central Committee's filings, including contributions from themselves and illegal donations from other candidate authorized committees. The irregularities and illegal contributions must be rectified immediately.

2) Failure to report occupation and employer information for donors over \$100. (Violation of RCW 42.17A.240, WAC 390-16-037)

Washington's campaign finance law requires a campaign to timely report contributions received. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of any individual contributor giving more than \$100 in the aggregate. Unfortunately, the Pierce County Democratic Party failed to include this information for the following contributions:

LEIGHTON JUSTIN 6/8/2016 \$250.00 N TACOMA WA 98405

3) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days. Per **WAC 390-05-295**, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

The Pierce County Democratic Central Committee failed to illegally report the following debts on preceding C4s: (See Exhibit C "Illegal Failure to Report Debt by Pierce County Democrats")

4) Failure to properly break down expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205)

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with WAC 390-16-037, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

The Pierce County Democratic Party illegally failed to break down the following expenses: (See Exhibit D "Illegal Failure to break down expenditures by Pierce County Democrats")

5) Failure to list committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

The Pierce County Democratic Party failed to list following individuals as officers, as required by **RCW 42.17A.205(2)(c):**

Treasurer: Yolanda Rucker State Committeeman: Eric Herde State Committeewoman: Anita Latch Membership/Asst. Treasurer: Jordan Waits

Sergeant at Arms: Julian Wheeler

Only the following individuals were accurately listed on the 2017 C1PC.:

Chair: Gina Bua Vice Chair: Tim Farrell Secretary: Patti Dailey

Alarmingly, the true treasurer was not even listed on the committee's C1PC form.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any **person** who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee".

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

6) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

I have reason to believe the following individuals have made illegal expenditures for the committee, in violation of state law:

Treasurer: Yolanda Rucker State Committeeman: Eric Herde State Committeewoman: Anita Latch Membership/Asst. Treasurer: Jordan Waits

Sergeant at Arms: Julian Wheeler

The PDC should investigate the possibility that the Pierce County Democratic Party committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

Exhibit A -- Illegal Late Reported/Deposited Contributions by Pierce County Democrats

Violation			Demo	Dates Late		
#	Contribution date	Due Date (approximate)	Date Reported	(approximate)	Amount	Contributor
#	Contribution_date	Due Date (approximate)	Date Reported	(approximate)	Amount	Contributor
1	10/16/2015	10/19/2015	4/15/2016	179	\$0.24	Unitemized.
2						GARDNER LAURA
3						JINKINS LAURIE
4			4/15/2016		·	JINKINS LAURIE
·	10/10/1010	10, 20, 2013	., 10, 2010		ψ <u>2</u> 0.00	ADAM SMITH FOR CONGRESS
5	10/24/2015	10/26/2015	4/15/2016	172	\$300.00	COMMITTEE
6						FARRELL TIMOTHY
	10/11/2010	10/20/2013	1,10,2010		ψ, σ.σσ	Contributions of \$25 or less
7	10/24/2015	10/26/2015	4/15/2016	172	\$10.00	contributed by: 1 persons.
8						DEMARCO KIMBERLY
9	· · · · · · · · · · · · · · · · · · ·					DRESCHER KEIL
10	ļ					EDWARDS KAREN
11	· · · · · · · · · · · · · · · · · · ·					EDWARDS KAREN
12			3/20/2016			FEUERSTEIN CINDY
13						FRANKLIN T'WINA
14					·	FRANKLIN T'WINA
15					·	GILES JACQUELYN E
16						GILES VANESSA
17			3/20/2016			GOGERTY-NORTHRIP EMILY
18						GROVES LAURA
19						HAGEN WAYNE
20						HAGEN WAYNE
21					·	HARRISON RANDY
22						HILLS DAVID
23	-, ,					IBSEN ANDERS
24	ļ					NIXON WILLIAM
25						NORTHRIP IAN
26						NORTHRIP IAN
27	10/2/2015			167		PELOQUIN MARISA
	10, 2, 2013	10,0,2010	3,20,2010	20.	Ų120.00	PIERCE COUNTY DEMOCRATIC
28	10/2/2015	10/5/2015	3/20/2016	167	\$281.00	CENTRAL COMMITTEE
29						PIERCE COUNTY YOUNG
30	· · · · · · · · · · · · · · · · · · ·					QUINLAN THOMAS P II
31						SADLER JEFF
32	<u> </u>					SAWYER DAVID
33	ļ		3/20/2016			TOWNSEND DENNIS
34	ļ					VERNER MARY B.
35						WILLIAMS KARL
36						WILLIAMS MARK
37	10/2/2015					WOLF KATHLEEN
38						WONG YOSHIE

Violation				Dates Late		
#	Contribution date	Due Date (approximate)	Date Reported		Amount	Contributor
39	9/30/2015	10/5/2015	3/20/2016	167	\$600.00	29TH LEGISLATIVE DISTRICT
40	10/2/2015		3/20/2016	167	\$5.00	ARNETT CONSTANCE M
41	10/2/2015	10/5/2015	3/20/2016	167	\$250.00	BAINES JESSIE
42	10/2/2015	10/5/2015	3/20/2016	167	\$250.00	BAINES JESSIE
43	9/30/2015	10/5/2015	3/20/2016	167	\$75.00	BARLOW ELIZABETH
44	10/2/2015	10/5/2015	3/20/2016	167	\$150.00	BARLOW ELIZABETH
45	10/1/2015	10/5/2015	3/20/2016	167	\$75.00	BAUER TOMMY
46	10/2/2015	10/5/2015	3/20/2016	167	\$388.00	BOAD JESSICA
47	10/2/2015	10/5/2015	3/20/2016	167	\$105.00	CAMPBELL SUSAN
48	10/2/2015	10/5/2015	3/20/2016	167	\$175.00	COEN DAN
49	10/2/2015	10/5/2015	3/20/2016	167	' '	COHEN LOREN
50	10/2/2015	10/5/2015	3/20/2016	167	,	CRAWFORD JAMES
51	9/30/2015	10/5/2015	3/20/2016	167	,	DARNEILLE JEANNIE
52	10/2/2015	10/5/2015	3/20/2016	167	·	JENKINS, SR. WILL
53	10/2/2015	10/5/2015	3/20/2016	167	· ·	JENKINS, SR. WILL
54	10/2/2015	10/5/2015	3/20/2016	167	·	JOHNSON JOHNATHAN L
55	9/30/2015	10/5/2015	3/20/2016	167		KIRK GAIL
56	9/28/2015	10/5/2015	3/20/2016	167		LADENBURG JOHN AND
57	10/2/2015	10/5/2015	3/20/2016	167		LADENBURG JOHN
58	10/2/2015	10/5/2015		167		LADENBURG JOHN
59	10/2/2015	10/5/2015	3/20/2016	167		LEIGHTON JUSTIN
60	9/29/2015	10/5/2015		167	· ·	LINDQUIST MARK
61	10/2/2015	10/5/2015	3/20/2016	167	,	LOPEZ JOE
62	10/2/2015	10/5/2015	3/20/2016	167		MATTSEN TERESE
63	9/30/2015	10/5/2015	3/20/2016	167	·	MCCARTHY PAT
64	10/2/2015	10/5/2015	3/20/2016	167	·	MCCORMICK JAMES
65	10/2/2015	10/5/2015	3/20/2016	167	·	WONG YOSHIE
66	10/2/2015	10/5/2015	3/20/2016	167		YOUNG DEREK
67	10/2/2015	10/5/2015	3/20/2016	167		LATCH ANITA Item Donator
68	10/2/2015			167		LATCH ANITA Item Donator
69	10/2/2015	10/5/2015	3/20/2016	167		LATCH ANITA Item Donator
70	10/2/2015	10/5/2015	3/20/2016	167		LATCH ANITA Item Donator
71	10/2/2015	10/5/2015	3/20/2016	167	,	LATCH ANITA Item Donator
72	10/2/2015	10/5/2015	3/20/2016	167	\$100.00	BAARSMA WILLIAM H Item
	10/2/2015	10/5/0015	2/22/2246	467	467.00	CHILDREN'S MUSEUM OF
73	10/2/2015	10/5/2015		167	,	TACOMA Item Donator
74	10/2/2015	10/5/2015	3/20/2016	167		GROVES LAURA Item Donator
75	10/2/2015	10/5/2015	3/20/2016	167	,	ISENSON LINDA Item Donator
76	10/2/2015	10/5/2015	3/20/2016	167	·	ISENSON LINDA Item Donator
77 78	10/2/2015	10/5/2015		167		ISENSON LINDA Item Donator
	10/3/2015			167	· ·	ISENSON LINDA Item Donator
79	10/3/2015	10/5/2015	3/20/2016	167	·	ISENSON LINDA Item Donator
80	10/2/2015	10/5/2015		167		GERMAN NORMA LItem
81	10/2/2015	10/5/2015		167		GERMAN NORMA L Item
82	10/2/2015	10/5/2015	3/20/2016	167	\$279.00	WILLIAMS KARL Item Donator

Violation				Dates Late		
#	Contribution_date	Due Date (approximate)	Date Reported	(approximate)	Amount	Contributor
	=		-	-		NORTHRIP PAM AND
83	10/2/2015	10/5/2015	3/20/2016	167	\$1,000.00	CHARLES Item Donator
84	10/2/2015	10/5/2015	3/20/2016	167	\$50.00	ETC TACOMA Item Donator
85	10/2/2015	10/5/2015	3/20/2016	167	\$30.00	VALHALLA COFFEE Item
86	10/2/2015	10/5/2015	3/20/2016	167	\$300.00	TRIANGLE PACIFIC LLC Item
87	10/2/2015	10/5/2015	3/20/2016	167	\$38.00	GARMAN AL Item Donator
88	10/2/2015	10/5/2015	3/20/2016	167	\$150.00	MY HERO HANDYMAN Item
89	10/2/2015	10/5/2015	3/20/2016	167	\$121.00	TACOMA RAINIERS Item
90	10/2/2015	10/5/2015	3/20/2016	167	\$210.00	HOTEL MURANO Item Donator
91	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	ISENSON BEV Item Buyer
92	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	CURTICE CAROLYN Item Buyer
93	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	MATTSON DOUG Item Buyer
94	10/2/2015	10/5/2015	3/20/2016	167	\$23.00	SAWYER DAVID Item Buyer
95	10/2/2015	10/5/2015	3/20/2016	167	\$7.00	GROVES LAURA Item Buyer
96	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	GROVES LAURA Item Buyer
97	10/3/2015	10/5/2015	3/20/2016	167	\$100.00	QUINLAN THOMAS P II Item
98	10/3/2015	10/5/2015	3/20/2016	167	\$0.00	QUINLAN THOMAS P II Item
99	10/2/2015	10/5/2015	3/20/2016	167	\$100.00	SADLER JEFF Item Buyer
100	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	SADLER JEFF Item Buyer
101	10/2/2015	10/5/2015	3/20/2016	167	\$90.00	SADLER JEFF Item Buyer
102	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	BECKENDORF JERRY W Item
103	10/2/2015	10/5/2015	3/20/2016	167	\$300.00	NORTHRIP IAN Item Buyer
104	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	NORTHRIP IAN Item Buyer
105	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	NORTHRIP IAN Item Buyer
106	10/2/2015	10/5/2015	3/20/2016	167	\$4.00	RODRIQUEZ RALPH Item Buyer
107	10/2/2015	10/5/2015	3/20/2016	167	\$10.00	HUSTON GREG Item Buyer
108	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	MOSESLY KORBETT Item Buyer
109	10/2/2015	10/5/2015	3/20/2016	167	\$5.00	ARNETT CONSTANCE M Item
110	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	ARNETT CONSTANCE M Item
111	10/2/2015	10/5/2015	3/20/2016	167	\$30.00	ARNETT CONSTANCE M Item
112	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	ARNETT CONSTANCE M Item
113	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	ARNETT CONSTANCE M Item
114	10/2/2015	10/5/2015	3/20/2016	167	\$0.00	BARLOW ELIZABETH Item
						Contributions of \$25 or less
115	10/2/2015	10/5/2015	3/20/2016	167	\$205.00	contributed by: 16 persons.
116	10/5/2015	10/12/2015	3/20/2016	160	\$100.00	DARNEILLE JEANNIE
117	10/5/2015	10/12/2015	3/20/2016	160	\$75.00	FRIENDS OF MARIA
118	10/5/2015	10/12/2015	3/20/2016	160		HARRY TRUMAN FUND
119	10/5/2015	10/12/2015	3/20/2016	160	\$75.00	HESTER REBECCA
120	10/5/2015	10/12/2015	3/20/2016	160	\$100.00	ORDONEZ DYLAN
121	10/5/2015	10/12/2015	3/20/2016	160	\$600.00	PEOPLE FOR DEREK KILMER
						PIERCE COUNTY DEMOCRATIC
122	10/11/2015	10/12/2015	3/20/2016	160	\$66.00	CENTRAL COMMITTEE
						PIERCE COUNTY TACOMA
123	10/5/2015	10/12/2015	3/20/2016	160	\$150.00	ALLIANCE FOR RETIRED

Violation				Dates Late		
#	Contribution date	Due Date (approximate)	Date Reported		Amount	Contributor
124	10/11/2015	10/12/2015		160		SEIU 775 QUALITY CARE
125	10/5/2015	10/12/2015		160		SRAIL DEBI
126		10/12/2015		160		ADLER LAUREN
127	10/5/2015	10/12/2015	3/20/2016	160	· ·	BAARSMA WILLIAM H
128	10/11/2015	10/12/2015		160		CONSTANTINE DOW
129	10/11/2015	10/12/2015		160		CONSTANTINE DOW
130	10/5/2015	10/12/2015		160		CORNEILLE WALTER
131	10/5/2015	10/12/2015		160	,	JINKINS LAURIE
131				160		KAPPHAHN SALLY
	10/5/2015	10/12/2015	3/20/2016		·	
133	10/5/2015	10/12/2015	3/20/2016	160		KENNEDY FUND
134	10/5/2015	10/12/2015	3/20/2016	160		KIRK GAIL
135	10/5/2015	10/12/2015		160		KRUPA & CLARK P.S.
136		10/12/2015		160		MACDONALD LYNN
137	10/5/2015	10/12/2015	3/20/2016	160		MATTSEN TERESE
138	10/5/2015	10/12/2015		160	· ·	MOELLER JIM
139	10/5/2015	10/12/2015	3/20/2016	160		MOELLER JIM
140	10/5/2015	10/12/2015		160		MYERS PEGGY
141	10/7/2015	10/12/2015	3/20/2016	160	\$50.00	WORTHAM LATASHA
142	10/5/2015	10/12/2015	3/20/2016	160	\$133.00	KILDUFF CHRISTINE Item
143	10/5/2015	10/12/2015	3/20/2016	160	\$40.00	BABIC JOANNE Item Donator
144	10/5/2015	10/12/2015	3/20/2016	160	\$15.00	GERMAN NORMA L Item
145	10/5/2015	10/12/2015	3/20/2016	160	\$50.00	CANZLER RON Item Donator
146	10/5/2015	10/12/2015	3/20/2016	160	\$20.00	CANZLER RON Item Donator
						WATKINS MEGAN AND
147	10/5/2015	10/12/2015	3/20/2016	160	\$500.00	JULIAN Item Donator
148	10/5/2015	10/12/2015	3/20/2016	160	\$20.00	YAMBE BRYAN Item Donator
149	10/5/2015	10/12/2015	3/20/2016	160	\$0.00	EDWARDS KAREN Item Buyer
150	10/5/2015	10/12/2015	3/20/2016	160	\$0.00	SRAIL DEBI Item Buyer
151	10/5/2015	10/12/2015	3/20/2016	160	\$100.00	GROVES LAURA Item Buyer
152	10/5/2015	10/12/2015	3/20/2016	160	\$5.00	SMITHERMAN KAREN Item
153	10/5/2015	10/12/2015	3/20/2016	160	\$17.00	HESTER REBECCA Item Buyer
154	10/5/2015	10/12/2015	3/20/2016	160	\$12.00	HESTER REBECCA Item Buyer
155	10/5/2015	10/12/2015	3/20/2016	160	\$10.00	GRAVES MARILYN Item Buyer
156		10/19/2015		153	\$600.00	HECK DENNY HECK FOR
157	6/30/2016	· · ·		104	·	GARDNER LAURA
158	7/1/2016			104		Miscellaneous Receipts
	7,1,2010	7, 1, 2020	10/ 10/ 2010	201	ψ0.12 2	Contributions of \$25 or less
159	6/27/2016	7/4/2016	10/16/2016	104	\$30.00	contributed by: 2 persons.
160	9/6/2015	9/7/2015		97		WOOLVERTON DONNA
100	3,0,2013	5/1/2013	12/13/2013	37	7130.00	PIERCE COUNTY DEMOCRATIC
161	7/7/2016	7/11/2016	10/16/2016	97	റവ വർ	CENTRAL COMMITTEE
161				97		
162	6/3/2016	6/6/2016	9/11/2016	97	\$0.39	Miscellaneous Receipts
460	6/2/2016	c le lance	0/11/2015	0=	ć20.00	Contributions of \$25 or less
163	6/3/2016	6/6/2016	9/11/2016	97	\$20.00	contributed by: 2 persons.

Violation				Dates Late		
#	Contribution date	Due Date (approximate)	Date Reported		Amount	Contributor
		(рр		(арр. с		Contributions of \$25 or less
164	7/5/2016	7/11/2016	10/16/2016	97	\$90.00	contributed by: 5 persons.
					·	PIERCE COUNTY DEMOCRATIC
165	12/31/2015	1/11/2016	4/15/2016	95	\$167.00	CENTRAL COMMITTEE
						PIERCE COUNTY DEMOCRATIC
166	12/31/2015	1/11/2016	4/15/2016	95	\$162.00	CENTRAL COMMITTEE
						Contributions of \$25 or less
167	12/5/2015	1/11/2016	4/15/2016	95	\$10.00	contributed by: 1 persons.
						Contributions of \$25 or less
168	12/5/2015	1/11/2016	4/15/2016	95	\$10.00	contributed by: 1 persons.
169	9/9/2015	9/14/2015		90	\$40.00	BETOR MALAKAY
170	9/9/2015	9/14/2015	12/13/2015	90	7-0-00	BLOCKER KEITH
171	9/9/2015	9/14/2015	12/13/2015	90		WOODARDS VICTORIA
172	9/10/2015	9/14/2015	12/13/2015	90	\$100.00	KUETER VINCE
173	9/10/2015	9/14/2015		90		MARATAS MICHAEL
174	9/10/2015	9/14/2015	12/13/2015	90	\$50.00	MULLEN CARLOS
175	9/10/2015	9/14/2015		90	\$75.00	SRAIL DEBI
176	9/10/2015	9/14/2015	12/13/2015	90	\$40.00	WORTHAM LATASHA
177	9/11/2015	9/14/2015	12/13/2015	90		IZANT PHYLLIS
178	9/13/2015	9/14/2015	12/13/2015	90	\$40.00	LAAKSO JOHN
179	9/13/2015	9/14/2015	12/13/2015	90		LAAKSO JOHN
180	6/8/2016			90	,	LEIGHTON JUSTIN
181	6/10/2016	6/13/2016	9/11/2016	90		MCCARTHY PAT
182	9/9/2015	9/14/2015	12/13/2015	90	· · · · · · · · · · · · · · · · · · ·	Miscellaneous Receipts
183	7/15/2016			90		Miscellaneous Receipts
184	6/18/2016			83	·	MCCARTHY CONOR
185	6/18/2016					RASMUSSEN MARILYN
186	6/18/2016	6/20/2016		83		ROONEY KERI
187	6/17/2016			83	,	SMABY BEVERLY
188	6/17/2016			83	,	Miscellaneous Receipts
189	9/25/2015	9/28/2015		76		BAYLISS ROBERT
190	9/27/2015	9/28/2015		76		CAMPBELL SUSAN
191	9/26/2015	9/28/2015		76	·	COX PATTI
192	9/26/2015	9/28/2015		76	· ·	DAVIS RASHELLE
193	9/23/2015	9/28/2015		76		DOOR JULIE
194	9/26/2015	9/28/2015		76	,	FALLSTONE KRISTINE
195	9/26/2015	9/28/2015		76	· ·	FALLSTONE KRISTINE
196		9/28/2015		76		FARRIS ROBIN
197	9/26/2015	9/28/2015		76	·	GILES JACQUELYN E
198	9/26/2015	9/28/2015		76	,	GROVES LAURA
199	9/25/2015	9/28/2015		76	·	HERDE ED
200	-, -, -	9/28/2015		76	,	ISENSON BEV
201	9/26/2015	9/28/2015		76	,	ISENSON LINDA
202	9/25/2015	9/28/2015		76	,	JENSEN JAN
203	9/26/2015	9/28/2015	12/13/2015	76	\$75.00	JOHNSON JOHNATHAN L

Violation				Dates Late		
#	Contribution_date	Due Date (approximate)	Date Reported	(approximate)	Amount	Contributor
204	9/26/2015	9/28/2015	12/13/2015	76	\$75.00	JOHNSON JOHNATHAN L
205	9/25/2015	9/28/2015	12/13/2015	76	\$75.00	KILDUFF CHRISTINE
206	9/25/2015	9/28/2015	12/13/2015	76	\$75.00	LANTZ MARTHA
207	9/24/2015	9/28/2015	12/13/2015	76	\$75.00	LATCH ANITA
208	9/24/2015	9/28/2015	12/13/2015	76	\$150.00	MACDONALD LYNN
209	9/24/2015	9/28/2015	12/13/2015	76		NORTHRIP IAN
210	9/25/2015	9/28/2015	12/13/2015	76		BAARSMA WILLIAM H
211	9/25/2015	9/28/2015	12/13/2015	76		NORTHRIP IAN
212	9/26/2015	9/28/2015	12/13/2015	76	\$150.00	REYNOLDS SHANNON
213	9/26/2015	9/28/2015	12/13/2015	76		ROBERTS-DEMPSEY PAT
214	9/25/2015	9/28/2015	12/13/2015	76		SAWYER DAVID
215	9/22/2015	9/28/2015	12/13/2015	76		SCHNEIDER STEVEN
216	9/25/2015	9/28/2015	12/13/2015			SEAQUISTT LARRY
217	9/27/2015	9/28/2015	12/13/2015	76	,	SINDERMAN CHRISTIAN
218	9/23/2015	9/28/2015	12/13/2015	76		SMITHERMAN KAREN
219	9/22/2015	9/28/2015	12/13/2015	76		TALBERT RICK
220	9/25/2015	9/28/2015	12/13/2015	76	\$75.00	TOWNSEND DENNIS
						WASHINGTON STATE
221	9/26/2015	9/28/2015	12/13/2015	76	. ,	DEMOCRATIC CENTRAL
222	8/3/2016					26TH LEGISLATIVE DISTRICT
223	8/5/2016	8/8/2016	10/16/2016	69	\$0.48	Miscellaneous Receipts
						Contributions of \$25 or less
224	8/3/2016	8/8/2016		69		contributed by: 2 persons.
225	8/11/2016	8/15/2016				ALLIANCE TO PROTECT I-502
226	8/11/2016	8/15/2016		62		DOWNES NATHANIEL S
227	8/19/2016	8/22/2016		55		ACTIVE IN DEMOCRACY
228	8/19/2016	8/22/2016		55	. ,	KENNEDY FUND
229	8/20/2016	8/22/2016	10/16/2016	55	\$40.00	LINDQUIST MARK
220	0/00/0046	0/00/0046	10/15/2015		4222.00	PIERCE COUNTY DEMOCRATIC
230	8/20/2016	8/22/2016	10/16/2016	55	\$300.00	CENTRAL COMMITTEE
224	0/20/2046	0/22/2016	40/45/2045		¢00.00	PIERCE COUNTY DEMOCRATIC
231 232	8/20/2016	8/22/2016				CENTRAL COMMITTEE
232	8/19/2016	8/22/2016		49		Miscellaneous Receipts
233	10/23/2016	10/24/2016		49	,	31ST LEGISLATIVE DISTRICT
234	10/21/2016	10/24/2016	12/12/2016	49	\$3,500.00	PEOPLE FOR DEREK KILMER PIERCE COUNTY DEMOCRATIC
225	10/22/2016	10/24/2016	12/12/2016	40	ć111 00	
235	10/23/2016	10/24/2016		49 49		CENTRAL COMMITTEE
236	10/21/2016	10/24/2016	12/12/2016	49	\$0.06	Miscellaneous Receipts Contributions of \$25 or less
237	10/22/2016	10/24/2016	12/12/2016	49	¢4E 00	contributed by: 2 persons.
237	10/23/2016 2/8/2016					BLAIR FRANCES E
238	2/9/2016	3/10/2016				BOCK LAURIE
240	2/9/2016	3/10/2016				MCGINNIS JOHN
240	2/9/2016	3/10/2016		46		MCGINNIS NANCY
241	2/9/2016	3/10/2016				O'REILLY DEBORAH

Violation	1			Dates Late		
#	Contribution_date	Due Date (approximate)	Date Reported		Amount	Contributor
243	2/9/2016		•	46		WILLIAMS VONTEICE R
244	· · · · · · · · · · · · · · · · · · ·	, ,		46		AKERVICK ROBERT
	, ,				·	Contributions of \$25 or less
245	2/5/2016	3/10/2016	4/25/2016	46	\$30.00	contributed by: 2 persons.
246	· · · · · · · · · · · · · · · · · · ·			42		Miscellaneous Receipts
		, ,			·	Contributions of \$25 or less
247	9/3/2016	9/5/2016	10/17/2016	42	\$10.00	contributed by: 1 persons.
248		9/5/2016		41	\$300.00	2ND LEGISLATIVE DISTRICT
249	8/30/2016	9/5/2016	10/16/2016	41	\$50.00	ROBISON GEORGE C
250	8/30/2016	9/5/2016	10/16/2016	41	\$100.00	TOWNSEND DENNIS
251	9/2/2016	9/5/2016	10/16/2016	41	\$0.40	Miscellaneous Receipts
						Contributions of \$25 or less
252	9/3/2016	9/5/2016	10/16/2016	41	\$20.00	contributed by: 2 persons.
253	11/6/2016	11/7/2016	12/13/2016	36	\$2,500.00	PEOPLE FOR PATTY MURRAY
254	11/4/2016	11/7/2016	12/13/2016	36	\$0.91	Miscellaneous Receipts
						Contributions of \$25 or less
255	11/3/2016	11/7/2016	12/13/2016	36	\$20.00	contributed by: 2 persons.
						Contributions of \$25 or less
256	9/5/2016	9/12/2016		34	\$10.00	contributed by: 1 persons.
257	6/12/2015	6/15/2015	7/16/2015	31	\$55.00	CORNEILLE WALTER
258	6/12/2015	6/15/2015		31		COEN DAN
259	6/15/2015	6/22/2015		15	\$50.00	BLOCKER KEITH
260	6/15/2015	6/22/2015	7/7/2015	15	\$110.00	LAAKSO JOHN
261	6/15/2015	6/22/2015	7/7/2015	15	\$110.00	KILDUFF CHRISTINE
262	6/15/2015	6/22/2015	7/7/2015	15	\$10.00	PIERCE COUNTY DEMOCRATS
263	-, ,	6/8/2015		10	'	KAPPHAHN SALLY
264	-, ,	6/8/2015	6/18/2015	10		HARROWE DAVID
265	6/4/2015	6/8/2015	6/18/2015	10	\$55.00	LOPEZ JOE
266		6/8/2015	6/18/2015	10	\$55.00	LOPEZ EVELYN
267	6/4/2015	6/8/2015	6/18/2015	10	\$110.00	SANTORNO CARLA
						Contributions of \$25 or less
268		6/8/2015	6/18/2015	10		contributed by: 2 persons.
269	6/5/2015	6/8/2015	6/18/2015	10	\$0.14	Miscellaneous Receipts
270		7/20/2015	7/29/2015	9		Miscellaneous Receipts
271	6/12/2015	6/15/2015		8		PIERCE COUNTY DEMOCRATS
272	6/12/2015	6/15/2015	6/23/2015	8		WILLIAMS VONTEICE R
273	· · · · · · · · · · · · · · · · · · ·	6/15/2015	6/23/2015	8	·	ROBISON GEORGE
274	-, ,	6/15/2015	6/23/2015	8	·	PEOPLE FOR DEREK KILMER
275	-, ,	6/15/2015	6/23/2015	8		WILLIAMS KARL
276	6/12/2015	6/15/2015	6/23/2015	8	\$27.50	NIXON JAMIE

Exhib	it B Illegal	ly Late Reported	d Expend	itures by Pier	ce Count	y Democrats	
Violation	Expenditure Date	Due Date	Date Reported	Dave Late	Vendor/Unitem ized Expenditures	Amount	Description
†	Expenditure Date	Due Date	Date Reported	Days Late	Expenditures	Amount	Description
1	10/12/2015	10/27/2015	4/15/2016	171	EXPENSES OF \$50 OR LESS		
1 2			4/15/2016 4/15/2016		VISI PRINTING	50 407.53	
3			4/15/2016		CONSTANT CONTACT	87.61	
4			4/15/2016		AUCTION SERVICES		Fundraising Event Expenses
5			4/15/2016		MICHALEK LAURA		AUCTIONEER
	10/10/2013	10/2//2013	4/13/2010	1/1	HAGGEN FOOD &	3500	ACCHONEEN
6	9/3/2015	10/13/2015	3/20/2016	159	PHARMACY	142.11	MEETING EXPENSES
7	9/8/2015	10/13/2015	3/20/2016	159	ISENSON LINDA	100	CHAIR EXPENSE
8	9/12/2015	10/13/2015	3/20/2016	159	AMAZON MARKETPLACE	93.65	WASHINGTON STATE FAIR EXPENDITURE
9	9/22/2015	10/13/2015	3/20/2016	159	COAST WENATCHEE CENTER	367.43	STATE MEETING
10	10/1/2015	10/13/2015	3/20/2016	159	HOTEL MURANO	12000	KPB EXPENSES
11	10/5/2015	10/13/2015	3/20/2016	159	HOTEL MURANO	174.13	Fundraising Event Expenses
12	10/8/2015	10/13/2015	3/20/2016	159	HOTEL MURANO	7579.86	KPB EXPENSES
13	10/8/2015	10/13/2015	3/20/2016	159	MCNALLY MANAGEMENT	860	RENT
14	9/1/2015	10/13/2015	3/20/2016	159	\$50 OR LESS	199.11	
15	10/2/2015	10/13/2015	3/20/2016	159	ALWAYS AFFORDABLE FLOWERS	445.09	KPB EXPENSES
16	9/2/2015	10/13/2015	3/20/2016	159	NGPVAN	250	General Operation and Overhead
17	9/21/2015	10/13/2015	3/20/2016	159	CONSTANT CONTACT	87.61	DIRECT EMAIL

					Vendor/Unitem		
Violation	5	D D. I.	D. I. D	D	ized		
#	Expenditure Date		Date Reported		Expenditures	Amount	Description NGP FEES
18	10/2/2015	10/13/2015	3/20/2016	159	NGPVAN	311.7	WASHINGTON STATE FAIR
10	0/0/2015	40/42/2045	2/20/2016	450	COCTCO	440.04	
19	9/9/2015	10/13/2015	3/20/2016	159	COSTCO	448.81	EXPENDITURE
20	0/11/2015	10/12/2015	2/20/2016	150	COCTCO	64.57	WASHINGTON STATE FAIR
20	9/11/2015	10/13/2015	3/20/2016	159	COSTCO PIERCE	61.57	EXPENDITURE
					COUNTY		
					CENTRAL		
					LABOR		
					COUNCIL, AFL-		
21	10/2/2015	10/12/2015	3/20/2016	150	CIO	71 25	DDINTING
21			3/20/2016		SQUARE		PRINTING SQUARE FEES KPB
	10/2/2013	10/15/2015	3/20/2010	139	EXPENSES OF	393	SQUARE FEES RPB
23	10/27/2015	12/10/2015	4/15/2016	127	\$50 OR LESS	155.44	
	10/27/2013	12/10/2013	4/13/2010	127	RAINIER	155.44	
24	11/12/2015	12/10/2015	4/15/2016	127	CONNECT	254.6	General Operation and Overhead
25			4/15/2016		HERDE ED		FAIR EXPENSES
23	11/0/2013	12/10/2013	4/13/2010	127	PEARMAN	177.2	TAIN EXPENSES
26	11/4/2015	12/10/2015	4/15/2016	127	BLAINE	174.41	FAIR EXPENSES
	11, 1,2013	12/10/2013	17 137 2010	12,	DE WITE	171111	TAIN EXI ENSES
27	11/2/2015	12/10/2015	4/15/2016	127	NGPVAN	186.89	General Operation and Overhead
28	11/3/2015	12/10/2015	4/15/2016	127	NGPVAN	250	General Operation and Overhead
29	11/3/2015	12/10/2015	4/15/2016	127	NGPVAN	350	General Operation and Overhead
29	11/3/2015	12/10/2015	4/15/2010	127	CONSTANT	250	General Operation and Overnead
30	11/21/2015	12/10/2015	4/15/2016	127	CONTACT	07.61	Conoral Operation and Overhead
30	11/21/2015	12/10/2015	4/15/2010	127	GUTIERREZ	87.01	General Operation and Overhead
31	11/25/2015	12/10/2015	4/15/2016	127	GLORIA	1127 5	AUCTION EXPENSE
32			4/15/2016		COSTCO		DEBATE WATCH PARTY
32	11/15/2015	12/10/2013	4/13/2010	127	PIERCE	33.07	DEBATE WATCHTAKIT
					COUNTY		
					CENTRAL		
					LABOR		
					COUNCIL, AFL-		
33	11/14/2015	12/10/2015	4/15/2016	127	CIO	11/1 7	COPYING
33	11/14/2013	12/10/2013	4/13/2010	127	GERMAN	114.7	11113
34	10/27/2015	12/10/2015	4/15/2016	127	NORMA L	156	Fundraising Event Expenses
					MCNALLY		
35	10/29/2015	12/10/2015	4/15/2016	127	MANAGEMENT	430	General Operation and Overhead
					WEINMAN		
36	11/18/2015	12/10/2015	4/15/2016	127	CONSULTING	300	DEBATE WATCH PARTY

					Vendor/Unitem		
Violation					ized		
#	Expenditure Date	Due Date	Date Reported	Days Late	Expenditures	Amount	Description
					EXPENSES OF		
37	12/1/2015	1/11/2016	4/15/2016	95	\$50 OR LESS	11.03	
					RAINIER		
38	12/15/2015	1/11/2016	4/15/2016	95	CONNECT	117.01	General Operation and Overhead
					RAY GIBSON'S		
					CABALLERO		
39	12/15/2015	1/11/2016	4/15/2016	95	CLUB	275	HOLIDAY PARTY
					28TH LD		
40	12/24/2015	1/11/2016	4/15/2016	95	DEMOCRATS	1256	BUTTON EXPENSES
					MCNALLY		
41	12/17/2015	1/11/2016	4/15/2016	95	MANAGEMENT	860	General Operation and Overhead
42	12/2/2015	1/11/2016	4/15/2016	95	NGPVAN	250	General Operation and Overhead
40	12/2/2015	4/44/2046	1/15/2016	0.5		400 50	
43	12/2/2015	1/11/2016	4/15/2016	95	NGPVAN	102.58	General Operation and Overhead
	12/21/2015	1/11/2016	4/15/2016	٥٦	CONSTANT	60.22	Cararal Organitian and Organican
44	12/21/2015	1/11/2016	4/15/2016	95	CONTACT EXPENSES OF	60.23	General Operation and Overhead
45	10/18/2016	11/1/2016	12/12/2016	41	\$50 OR LESS	0	
45	10/16/2010	11/1/2010	12/12/2010	41	MARISA	0	
					PELOQUIN FOR		
46	10/28/2016	11/1/2016	12/12/2016	11	SENATE	500	Contributions
40	10/28/2010	11/1/2010	12/12/2010	41	28TH LD	300	Contributions
47	10/18/2016	11/1/2016	12/12/2016	Л1	DEMOCRATS	1917	BUTTONS
47	10/10/2010	11/1/2010	12/12/2010	41	HOTEL	1017	DEPOSIT FOR ELECTION NIGHT
48	10/25/2016	11/1/2016	12/12/2016	Д1	MURANO	1000	EVENT
49	10/19/2016				TALBERT RICK		TALBERT CAMPAIGN
13	10/13/2010	11/1/2010	12/12/2010		EXPENSES OF	15000	THE SERVE OF WATER A SE
50	5/1/2015	6/10/2015	6/17/2015	7	\$50 OR LESS	224.54	
- 50	3/1/2013	0,10,2013	0/1//2013	,	RAINBOW		BOOTH FEES FOR OUT IN THE
51	5/27/2015	6/10/2015	6/17/2015	7	CENTER	100	PARK
	-, ,	., .,	. ,		PIERCE		
					COUNTY		
					CENTRAL		
					LABOR		
					COUNCIL, AFL-		
52	5/22/2015	6/10/2015	6/17/2015	7	CIO	96.3	MEETING COPIES (2 MONTHS)
53	5/22/2015	6/10/2015	6/17/2015		VISI PRINTING		PRINTING
					CONSTANT		
54	5/21/2015	6/10/2015	6/17/2015	7	CONTACT	87.61	EMAIL DATABASE
55	5/1/2015	6/10/2015	6/17/2015	7	COSTCO	51.62	MEETING EXPENSES

						Vendor/Unitem		
Violation						ized		
#	Expenditure Date	Due Date	Date Reported	Days Late		Expenditures	Amount	Description
						MCNALLEY		
56	5/1/2015	6/10/2015	6/17/2015			MANAGEMENT	430	RENT
	5, 5, 5, 5	2, 20, 2020	5, 21, 2020			RAINIER		
57	5/21/2015	6/10/2015	6/17/2015		7	CONNECT	116.43	TELEPHONE AND INTERNET
58	4/22/2015	5/11/2015	5/16/2015		5	COSTCO	234.65	FOOD FOR FISH BAKE
						PIERCE		
						COUNTY		
59	4/20/2015	5/11/2015	5/16/2015			DEMOCRATS	87.59	TRANSFER TO CHECKING
		- 1 - 1				BEVERAGES &		
60	4/24/2015	5/11/2015	5/16/2015			MOR	210.88	BEVERAGES FOR FISH BAKE
C1	4/4/2015	F /11 /2015	F /1 C /201 F			EXPENSES OF	226 52	
61	4/1/2015	5/11/2015	5/16/2015		5	\$50 OR LESS	236.53	
						EMERALD		
62	4/25/2015	5/11/2015	5/16/2015			QUEEN CASINO	85	FISH BAKE EXPENDITURE
- 02	1,23,2013	3/11/2013	3/10/2013			RAINIER	03	TISTI BAILE EXI ENSITORE
63	4/16/2015	5/11/2015	5/16/2015			CONNECT	116.43	TELEPHONE AND INTERNET
						HOTEL		
64	6/3/2015	7/14/2015	7/16/2015		2	MURANO	1500	DEPOSIT FOR KEEP PIERCE BLUE
						EXPENSES OF		
65	6/1/2015	7/14/2015	7/16/2015		2	\$50 OR LESS	121.43	
						CONSTANT		
66	6/22/2015	7/14/2015	7/16/2015		2	CONTACT	87.61	EMAIL SERVICES
67	6/6/2015	7/14/2015	7/16/2015			MCNALLEY MANAGEMENT	420	RENT
67	6/6/2015	7/14/2015	7/16/2015		2	IVIANAGEIVIENT	430	REINI
					,	TACOMA		
68	6/4/2015	7/14/2015	7/16/2015			FREEDOM FAIR	210	FREEDOM FAIR FEE
	5, 1, 2020	17=17=0=0	1,10,1010					
						WESTERN		
						WASHINGTON		WASHINGTON STATE FAIR BOOTH
69	6/23/2015	7/14/2015	7/16/2015		2	FAIR, PUYALLUP	1400	DEPOSIT
								WEBSITE, EMAIL CAMPAIGN
70	7/2/2015	7/14/2015	7/16/2015			NGPVAN	250	PROGRAM
		_,,	_ , _ , _			TACOMA		TACOMA RAINIERS TICKET
71	6/30/2015	7/14/2015	7/16/2015			RAINIERS	1757.75	PURCHASE FOR FUNDRAISER
						PIERCE		
						COUNTY CENTRAL		
						LABOR		
						COUNCIL, AFL-		
72	11/2/2016	12/12/2016	12/14/2016			CIO	104.3	COPYING

					Vendor/Unitem		
Violation	5	D D. I.	D.1. D	Barra Lata	ized		B
#	Expenditure Date	Due Date	Date Reported	Days Late	Expenditures	Amount	Description
					CHERYL		
					STOVER		
73	11/8/2016	12/12/2016	12/14/2016	2	PHOTOGRAPHY	816	ELECTION NIGHT PARTY EXPENSES
,,	11/0/2010	12/12/2010	12/11/2010		11101001011111	010	ELECTION MIGHT FAMILY EXILENSES
					FRIENDS OF		
74	11/2/2016	12/12/2016	12/14/2016	2	LINDA FARMER	1000	CAMPAIGN DONATION - GENERAL
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, ,	, , , , ,		FRIENDS OF		
75	11/2/2016	12/12/2016	12/14/2016	2	MARI LEAVITT	1000	CAMPAIGN DONATION - GENERAL
					MCNALLY		
76	11/8/2016	12/12/2016	12/14/2016	2	MANAGEMENT	430	RENT
					MITCHELL		
77	11/16/2016	12/12/2016	12/14/2016	2	JEANNINE C	66.08	ELECTION NIGHT PARTY EXPENSES
					EXPENSES OF		
78	11/1/2016	12/12/2016	12/14/2016	2	\$50 OR LESS	25	
					US POSTAL		
79	11/24/2016	12/12/2016	12/14/2016	2	SERVICE	117.5	RE-ORG MAILING
					RAINIER		
80	11/30/2016	12/12/2016	12/14/2016	2	CONNECT	236.78	PHONE/INTERNET
					EDMONDS		
81	11/9/2016	12/12/2016	12/14/2016	2	CAROLYN	1000	CAMPAIGN DONATION - GENERAL
					HOTEL		
82	11/9/2016		12/14/2016		MURANO		General Operation and Overhead
83	11/2/2016		12/14/2016		NGPVAN		PROCESSING FEES
84	11/30/2016	12/12/2016	12/14/2016	2	NGPVAN	500	NOVEMBER/DECEMBER 2016
					FRIENDS OF		
					MICHELLE		
85	11/1/2016	12/12/2016	12/14/2016	2	CHATTERTON	1000	CAMPAIGN DONATION - GENERAL
					FRIENDS TO		
					ELECT AMY		
0.0	44/4/2046	40/40/2046	12/11/2016		PIVETTA	1000	
86	11/4/2016	12/12/2016	12/14/2016		HOFFMAN	1000	CAMPAIGN DONATION - GENERAL
					NAUL ENINUAL S		
					MILLENNIALS		
87	11/7/2016	12/12/2016	12/14/2016	า	FOR A VIBRANT PIERCE COUNTY	1000	CONTRIBUTION
8/	11/7/2016	12/12/2016	12/14/2016	2	FIERCE COUNTY	1000	CONTRIBUTION
					MILLENNIALS		
					FOR A VIBRANT		
88	11/8/2016	12/12/2016	12/14/2016	2	PIERCE COUNTY	1000	CONTRIBUTION

					Vendor/Unitem		
Violation					ized		
#	Expenditure Date	Due Date	Date Reported	Days Late	Expenditures	Amount	Description
					VOTE JAMIE		
89	11/2/2016	12/12/2016	12/14/2016		2 SMITH	1000	CAMPAIGN DONATION - GENERAL
					EXPENSES OF		
90	7/14/2015	7/28/2015	7/29/2015		1 \$50 OR LESS	66.42	
					CONSTANT		ļ
91	7/21/2015	7/28/2015	7/29/2015		1 CONTACT	87.61	EMAIL MARKETING SERVICE
					METRO PARKS		
92	7/16/2015	7/28/2015	7/29/2015		1 TACOMA	65	ETHNIC FEST BOOTH
93	7/21/2015	7/28/2015	7/29/2015		1 VISI PRINTING	131.28	BANNER
					RAINIER		
94	7/20/2015	7/28/2015	7/29/2015		1 CONNECT	116.43	TELEPHONE AND INTERNET
95	9/2/2016	10/18/2016	10/19/2016		1 NGPVAN	250	NGP MONTHLY FEE
96	10/3/2016	10/18/2016	10/19/2016		1 NGPVAN	250	General Operation and Overhead
	-,-,	-, -,	-, -, -				
					CAMPAIGN TO		
					RE-ELECT		
97	10/12/2016	10/18/2016	10/19/2016		1 DAVID SAWYER	3000	CAMPAIGN DONATION - GENERAL
					EXPENSES OF		
98	9/1/2016	10/18/2016	10/19/2016		1 \$50 OR LESS	102.66	
					MCNALLY		
99	10/3/2016	10/18/2016	10/19/2016		1 MANAGEMENT	430	General Operation and Overhead
	=======================================	=======================================	=======================================				
					MCNALLY		
100	10/3/2016	10/18/2016	10/19/2016		1 MANAGEMENT	96.51	General Operation and Overhead
101	10/6/2016				1 WILD FIN		CHAIR EXPENSE - MEETING
	. ,	,	, , , ,		RAINIER		
102	9/27/2016	10/18/2016	10/19/2016		1 CONNECT	117.84	TELEPHONE AND INTERNET
103	10/12/2016	10/18/2016	10/19/2016		1 STARBUCKS	150	VOLUNTEER APPRECIATION
		• •					

Exhibit C	Illegal Failure to	Report	Debt by Pierc	e County	Democrats
Date	Amount	Description	Debt that was illegally not reported.	,	
			This should have been		
11/9/2016	6900.57	General Operation and Overhead	reported as debt on the 7 day pre-general C4.		
7-7			This should have been reported as debt on		
8/4/2016	4691.38	CONVENTION COSTS	the 7 day pre-primary C4.		
			This should have been reported as debt on the 21 day pre-		
7/13/2016	2858	FAIR EXPENSES			
8/2/2016	2750	FAIR EXPENSES	This should have been reported as debt on the 7 day pre-primary C4.		
. (0.10.00		PRECINCT	This should have been reported as debt on the C4 covering the		
4/3/2016	2470.66	CAUCUS DATA	month of March. This hsould have been reported as debt on the 21 day pre-general		
10/18/2016	1817	BUTTONS	C4.		
E/2/2016	1750 04	CAUCUS	This should have been reported as debt on the C4 covering the		
	11/9/2016 8/4/2016 7/13/2016 4/3/2016	Date Amount 11/9/2016 6900.57 8/4/2016 4691.38 7/13/2016 2858 8/2/2016 2750 4/3/2016 1817	Date Amount Description 11/9/2016 General Operation and Overhead 8/4/2016 4691.38 COSTS 7/13/2016 2858 FAIR EXPENSES 8/2/2016 2750 FAIR EXPENSES 4/3/2016 2470.66 CAUCUS DATA 10/18/2016 1817 BUTTONS CAUCUS CAUCUS	Debt that was illegally not reported. Comparison and comparison	Date Amount Description not reported. This should have been reported as debt on the 7 day pre-general CA. This should have been reported as debt on the 7 day pre-primary CA. This should have been reported as debt on the 7 day pre-primary CA. This should have been reported as debt on the 21 day pre-primary CA. This should have been reported as debt on the 21 day pre-primary CA. This should have been reported as debt on the 21 day pre-primary CA. This should have been reported as debt on the 7 day pre-primary CA. This should have been reported as debt on the 7 day pre-primary CA. This should have been reported as debt on the 7 day pre-primary CA. This should have been reported as debt on the CA covering the month of March. This should have been reported as debt on the CA covering the month of March. This should have been reported as debt on the 21 day pre-general CA. This should have been reported as debt on the 21 day pre-general CA. This should have been reported as debt on the 21 day pre-general CA. This should have been reported as debt on the 21 day pre-general CA. This should have been reported as debt on the 21 day pre-general CA. This should have been reported as debt on the 22 day pre-general CA. This should have been reported as debt on the 22 day pre-general CA.

				Debt that was illegally	
Vendor	Date	Amount	Description	not reported.	
				-1: 1 111	
				This should have been	
ICENICON			CALICUS	reported as debt on	
ISENSON	F /4.2 /204.6	4556	CAUCUS	the C4 covering the	
BEV	5/13/2016	1556	EXPENSES	month of April.	
JERRY				This should be seen because	
HALLMA				This should have been	
N			ANNUAL	reported as debt on	
INSURAN	1/27/2016	4505.00	INSURANCE	the C4 covering the	
CE	4/27/2016	1505.98	PREMIUM	month of March.	
			DEDOCIT 500	This hsould have been	
			DEPOSIT FOR	reported as debt on	
HOTEL	10/25/2016	4000	ELECTION	the 21 day pre-general	
MURANO	10/25/2016	1000	NIGHT EVENT	C4.	
MCNALLY				This should have been	
				reported as debt on	
MANAGE	2/1/2212			the 7 day pre-primary	
MENT	8/4/2016	860	RENT	C4.	
MCNALLY				This should have been	
				reported as debt on	
MANAGE	2/22/22/2			the 7 day pre-primary	
MENT	8/29/2016	860	RENT	C4.	
CHERYL				This should have been	
STOVER			ELECTION	reported as debt on	
PHOTOG	11/0/2016	046	NIGHT PARTY	the 7 day pre-general	
RAPHY	11/8/2016	816	EXPENSES	C4.	
				This should be seen because	
2071115				This should have been	
28TH LD			CALICUS	reported as debt on	
DEMOCR	4/20/2016	630.80	CAUCUS	the C4 covering the	
ATS	4/20/2016	629.89	COPIES	month of March.	
				This should have been	
				reported as debt on	
	11/2/2016	500.00	PROCESSING	the 7 day pre-general	
NGPVAN	11/2/2016	523.23	FEES	C4.	
				This hsould have been	
			NOVEMBER/D	reported as debt on	
NICDY (A.A.	14/20/2016		ECEMBER 2016	the 21 day pre-general	
NGPVAN	11/30/2016	500	2016	C4.	
NACNIALLY				This should have been	
MCNALLY				This should have been	
NAANIA CE			DENT AND	reported as debt on	
MANAGE	2/7/2016		RENT AND	the C4 covering the	
MENT	3/7/2016	455	TWO KEYS	month of February.	

				Debt that was illegally	
Vendor	Date	Amount	Description	not reported.	
Vendor	Dute	Amount	Description	not reported.	
			(Likely for		
MCNALLY			rent, party	This should have been	
			illegally failed	reported as debt on	
MANAGE			to provide	the C4 covering the	
MENT	4/6/2016	430	description)	month of March.	
			. ,		
MCNALLY				This should have been	
				reported as debt on	
MANAGE				the C4 covering the	
MENT	3/9/2016	430	RENT	month of February.	
				This should have been	
MCNALLY				reported as debt on	
			General	the C4 covering the	
MANAGE			Operation and	month of December	
MENT	1/27/2016	430	Overhead	2015.	
			(Likely for		
MCNALLY			rent, party	This should have been	
			illegally failed	reported as debt on	
MANAGE			to provide	the C4 covering the	
MENT	6/10/2016	430	description)	month of May.	
MCNALLY				This should have been	
				reported as debt on	
MANAGE				the 7 day pre-general	
MENT	11/8/2016	430	RENT	C4.	
MCNALLY				L	
			General	This should have been	
MANAGE	40/2/2046	420		reported as debt on	
MENT	10/3/2016	430	Overhead	the post-primary C4.	
			(Likoly for		
			(Likely for lodging or a		
			function of		
BEST			somesort,		
WESTERN			party illegally	This should have been	
VVLJILININ			failed to	reported as debt on	
ALDERW			provide	the C4 covering	
OOD	2/2/2016	260.66	description)	January.	
300	2,2,2010	200.00	acacription)	January.	

Exhibit D -- Illegal Failure to breakdown expenditures by Pierce County Democrats

	Democrats							
Vendor	Date	Amount	Description	Failure to breakdown expenditure.				
PIERCE								
COUNTY								
CENTRAL								
LABOR				Failure to identify who				
COUNCIL				actually performed				
AFL-CIO	6/3/2016	99.45	PRINTING	the printing.				
PIERCE								
COUNTY								
CENTRAL								
LABOR				Failure to identify who				
COUNCIL				actually performed				
AFL-CIO	11/2/2016	104.3	COPYING	the copying.				
28TH LD				Failure to identify true				
DEMOCR	1/20/2016	500.00	CAUCUS	subvendor who				
ATS	4/20/2016	629.89	COPIES	printed copies.				
				Failure to identify true				
28TH LD				subvendor of buttons				
DEMOCR				& button				
ATS	10/18/2016	1817	BUTTONS	materials/paraphenalia				
7113	10/10/2010	1017	50110113	Failure to identify				
				subvendors of where				
				purchases were made,				
ISENSON			CAUCUS	what purchases were				
BEV	5/13/2016	1556	EXPENSES	for.				
NW								
PROGRES				Failure to describe				
SIVE				expenditure. Potential				
INSTITUT				illegal use of				
Е	4/13/2016	250		committee funds.				
				Failure to describe				
				expenditure. Potential				
ISENSON			CHAIR	illegal use of				
LINDA	7/26/2016	200	EXPENSES	committee funds.				

Vendor	Date	Amount	Description	Failure to breakdown expenditure.	
				Failure to describe	
NGPVAN	1/2/2016	250		expenditure.	
				Failure to describe	
NGPVAN	4/2/2016	250		expenditure.	
				Failure to describe	
NGPVAN	6/2/2016	250		expenditure.	
ISENSON				Failure to describe	
LINDA	7/30/2016	121.41		expenditure.	

1		PEDITE		and the second s				
2	No He	Hearing Set aring is Set		and the second s				
	I	Date:		UCI 2 7 2017				
3	T	Time:						
4				: Superior Cour: Linds Myhrs En/ow Thurston County Clark				
5				1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1				
6				EX PARTE				
7				WASHINGTON TY SUPERIOR COURT				
8	OT A TO	C OF III A GIID I GEOLI						
ا و	SIAI	E OF WASHINGTON,		NO. 17-2-04616-34				
10		Plaintiff,		STIPULATION AND AGREED				
11		V.		JUDGMENT				
12		E COUNTY DEMOCRATIC RAL COMMITTEE, a Washi						
13		red political committee,	~~~					
14		Defendant	.					
15		JUDGMEN	NT SUMI	MARY (RCW 4.64.030)				
16	A.	JUDGMENT CREDITOR:		E, STATE OF WASHINGTON				
17	B.	JUDGMENT DEBTOR:	PIERCE	COUNTY DEMOCRATIC CENTRAL				
18			COMMI committe	IITTEE, a Washington registered political ttee				
19	C.	PRINCIPAL JUDGMENT:	\$31,780	80 with \$15,890 suspended for a period of 4 years gent on no findings of violations of RCW 42.17A				
20			continge	contingent on no findings of violations of RCW 42.17A committed during the period of suspension				
21	D.	INTEREST:		adgment interest is owed. Principal judgment				
22			amount(s) due and owing shall not bear interest unless the principal judgment is unpaid by the due date specified herein					
23	E.	COSTS AND FEES:		in attorney fees. \$1,500 in investigation costs				
24	15.	COSTS AND FEES.	\$5,000 in attorney fees; \$1,500 in investigation costs, and \$240 in court costs					
25	F.	ATTORNEYS FOR JUDGMENT CREDITOR	ROBER	T W. FERGUSON, Attorney General				
26		10DOMENT CKEDITOK		A. DALTON, WSBA No. 15467 Assistant Attorney General				



STIPULATION AND AGREED JUDGMENT

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G.	ATTORNEY FOR
	JUDGMENT DEBTOR

EVELYN FIELDING LOPEZ, WSBA No. 18900 LOPEZ LAW PLLC

STIPULATION

The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE), and the Defendant, PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington registered political committee, desiring to resolve all claims arising out of the State's complaint, hereby enter into the following stipulation:

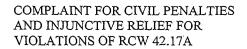
- 1. Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees to pay the State within 30 days of the date of entry of this Judgment an assessed civil penalty in the amount of \$31,780 with one-half suspended for four years, for its violations of RCW 42.17A for failing to timely disclose contribution and expenditure reports for election years 2015, 2016, and through the date of this agreement for 2017.
- 2. The parties agree that \$15,890 of the assessed civil penalty will be suspended based on the following terms and 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 PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees that it will not violate any provision of RCW 42.17A.
 - b. In the event Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$15,890 will immediately become due and payable within 30 days of such finding without further intervention of the Court.
 - c. If Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is not found to have committed violations of RCW 42.17A by the Public Disclosure

JUDGMENT

THIS MATTER came on regularly before the undersigned judge of the above-entitled Court. Plaintiff, STATE OF WASHINGTON (STATE), appearing through its attorneys of record, ROBERT W. FERGUSON, Attorney General and LINDA A. DALTON, Senior Assistant Attorney General, and Defendant, PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE appearing through its attorney, EVELYN FIELDING LOPEZ, 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 in the premises, it is hereby **ORDERED** as follows:

- Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is hereby assessed a civil penalty, under the provisions of RCW 42.17A, in the amount of \$31,780 payable to the State of Washington.
- 2. The amount of \$15,890 of the assessed penalty is hereby suspended upon Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE'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 PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE agrees that it will not violate any provision of RCW 42.17A.
 - b. In the event Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is found by the Public Disclosure Commission or a court to have committed a violation of RCW 42.17A during the suspension period, the suspended penalty of \$15,890 will immediately become due and payable within 30 days of such finding without further intervention of the Court.

1 2 3 4 5 6	EXPEDITE No Hearing Set Hearing is Set Date: Time:	San der Soud Here Enlaw The Fords South Disk
7 8		WASHINGTON TY SUPERIOR COURT
9	STATE OF WASHINGTON,	NO. 17-2-04616-34
10	Plaintiff,	COMPLAINT FOR CIVIL
11	v	PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF
12	PIERCE COUNTY DEMOCRATIC	RCW 42.17A
13	CENTRAL COMMITTEE, a Washington registered political committee,	
14	Defendant.	
15		
16	I. NATU	TRE OF ACTION
17	Plaintiff State of Washington (State) b	orings this action to enforce the State's campaign
18	finance disclosure law, RCW 42.17A. The S	State alleges that Defendant, PIERCE COUNTY
19	DEMOCRATIC CENTRAL COMMITTEE	E (the Committee), a Washington registered
20	political committee, violated provisions of	RCW 42.17A by: 1) failing to timely report
21	contributions it received, and 2) failing to tir	mely report expenditures it made including debts
22	and obligations with the State Public Disclo	osure Commission. The State seeks relief under
23	RCW 42.17A.750 and .765, including penaltic	es, costs and fees, and injunctive relief.
24	///	
25	///	
26		





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II. PARTIES

- 2.1 Plaintiff is the State of Washington. Acting through the Washington State Public Disclosure Commission, Attorney General, or a local prosecuting attorney, the State enforces the state campaign finance and disclosure laws contained in RCW 42.17A.
- 2.2 Defendant PIERCE COUNTY DEMOCRATIC CENTRAL COMMITTEE is registered with the state Public Disclosure Commission as a continuing bona fide political party committee. As the term is used under RCW 42.17A.005(6)(c), it is the county central committee for the Washington State Democratic Central Committee in Pierce County, Washington.

III. JURISDICTION AND VENUE

- 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 Defendant, a registered Washington State political committee. Additionally, the acts alleged below occurred in whole or in part in Thurston County, Washington.
 - 3.3 Venue is proper in this Court pursuant to RCW 4.12.020(1).

IV. FACTUAL ALLEGATIONS

- 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..."
- 4.2 Washington's campaign finance law requires a campaign to timely report contributions received. The information required to be disclosed includes the name and address

of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of any individual contributor giving more than \$100 in the aggregate. RCW 42.17A.240; WAC 390-16-037. Contribution disclosures are reported on a Public Disclosure Commission (PDC) form "C3" which is called the "Cash Receipt Monetary Contributions" form. Each week's contributions must be reported on the following Monday during the five months prior to a general election. RCW 42.17A.235(3).

- 4.3 Washington's campaign finance law also requires political committees to timely report expenditures related to state campaigns, including any debts incurred by the political committee. RCW 42.17A.235, .240(8); RCW 42.17A.005(20). The PDC form to report expenditures is called a "Summary, Full Report Receipts and Expenditures" and is a form "C4." An expenditure is defined to include "a *promise to pay*, For the purposes of this chapter, agreements to make expenditures, contracts, debts, and promises to pay may be reported as estimated obligations until actual payment is made." RCW 42.17A.005(20).
- 4.4 The Committee is a bona fide political party committee as the term is used in RCW 42.17A, and is more specifically, a county central committee of the Washington State Democratic Central Committee. As such, the Committee routinely raises funds in order to support various democratic candidates and ballot propositions. Since 2015, the Committee received contributions and made expenditures, all of which were required to be reported in accordance with RCW 42.17A.
- 4.5 The activities of the Public Disclosure Commission, including its receipt and compilation of reports required by law, are conducted in and about Thurston County.
- 4.6 On May 18, 2017, the Attorney General's Office received a citizen action notice alleging that the Committee had failed to timely file reports of contributions received and expenditures made, including debts and obligations, for the years 2015, 2016, and 2017.
 - 4.7 In May 2017, the Committee elected a new treasurer.

Failure to Timely Report Contributions Received

- 4.8 The Committee failed to timely disclose contributions it received as required by law on a C3 report. Specifically, the Committee failed to timely file and disclose \$51,817 in contributions received during 2015 and 2016 on 30 separate C3 reports. These reports ranged from eight to 179 days late, representing a collective total of 2,402 days late.
- 4.9 In 2015, \$33,217 of the late-reported contributions was disclosed from 76-172 days and not until after the general election.
- 4.10 For the year 2017, the Committee failed to file any C3 reports until after the citizen action notice received by the Attorney General's Office and complaint to the Public Disclosure Commission was provided to it.
- 4.11 The following chart summarizes the total deposits received by the Committee, the number of reports affected by the late reporting, and the cumulative days late for 2015, 2016, and 2017:

Year	Total Deposits	Number of C3 Reports	Days Late
2015	\$34,713.93	14	8-179
2016	\$17,103.17	16	34-104
2017	\$11,825.90	62	2-146
TOTAL	\$63,643.00	92	8,350

Failure to Timely Report Expenditures

- 4.12 In 2015, 2016, and 2017, the Committee failed to timely disclose expenditures made as required by law on a C4 report. Specifically, the Committee failed to timely file and disclose \$84,230 in expenditures made during 2015 and 2016 on 11 separate C4 reports. These reports ranged from 1 to 171 days late, representing a collective total of 611 days late.
- 4.13 For the year 2017, the Committee failed to file any C4 reports until after the citizen action notice received by the Attorney General's Office and complaint to the Public Disclosure Commission was provided to it.

4.14 The following chart identifies for each untimely report the amount of expenditures, and the number of days late for C4 reports due during 2015, 2016, and 2017:

Election Year	Date C4 Due	Date Reported	Days Late	Amount of Expenditures
2015	5/11/2015	5/16/2015	5	\$971.08
2015	6/10/2015	6/17/2015	7	\$1,196.95
2015	7/14/2015	7/16/2015	2	\$5,756.79
2015	7/28/2015	7/29/2015	1	\$466.74
2015	10/13/2015	3/20/2016	159	\$23,585.32
2015	10/27/2015	4/15/2016	171	\$5,001.02
2015	12/10/2015	4/15/2016	127	\$3,817.42
2016	1/11/2016	4/15/2016	95	\$2,931.85
2016	10/18/2016	10/19/2016	1	\$4,466.33
2016	11/1/2016	12/12/2016	41	\$18,317.00
2016	12/12/2016	12/14/2016	2	\$17,719.46
2017	2/10/2017	6/29/2017	139	\$18.34
2017	3/10/2017	6/29/2017	111	\$476.29
2017	4/10/2017	6/29/2017	80	\$55.00
2017	5/10/2017	6/29/2017	50	\$3,454.00
2017	6/12/2017	6/29/2017	17	\$2,124.36
TOTAL Reports:			TOTAL Days Late: 1,008	TOTAL Expenditures: \$90,357.95

Failure to timely report debts and obligations

4.15 On information and belief for the year 2016, the Committee failed to timely report debts and obligations it incurred during one reporting period but did not report until an invoice was paid. The unreported debts included expenses incurred for party convention and caucus events during 2016. The Committee did not dispute this allegation during the investigation period; rather, the Committee chose to place responsibility for this failure on its former chair and treasurer.

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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 <u>First Claim</u>: The State reasserts the factual allegations made above and further asserts that Defendant, in violation of RCW 42.17A.235 and .240, failed to timely disclose to the state Public Disclosure Commission contributions it received during 2015, 2016, and 2017.
- 5.2 <u>Second Claim</u>: Plaintiff reasserts the factual allegations made above and further asserts that Defendant, in violation of RCW 42.17A.235 and .240, failed to timely and completely disclose and describe expenditures it made, including debts and obligations, during 2015, 2016, and 2017 to the state Public Disclosure Commission.

VI. REQUEST FOR RELIEF

WHEREFORE, the State requests the following relief as provided by law:

- 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;
- 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as authorized by RCW 42.17A.765(5);
- 6.3 For temporary and permanent injunctive relief, as authorized by RCW 42.17A.750(1)(h); and
 - 6.4 For such other legal and equitable relief as this Court deems appropriate.

 DATED this 14th day of August, 2017.

OFFICE OF THE ATTORNEY GENERAL State of Washington

LINDA A. DALTON, WSBA No. 15467

Senior Assistant Attorney General

Attorneys for Plaintiff State of Washington

Pierce County Democrats continue tradition of illegally late reporting and regular lawbreaking

Repor	• #	Typo	Amends	Deposit Date	From		Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity Fil	lor	Hyperlink
керог	L #F	туре	Amenus	Date	FIUIII	Tillougii	Due Date	Jubillitteu	Days Late	•	IERCE COUNTY	пуреннік
1009	56513	3 C4	0		7/31/2018	8/31/2018	9/10/2018	2/9/2020	517	\$16.00 DE	EMOCRATIC PARTY IERCE COUNTY	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100956513
1009	56515	6 C4	0		9/1/2018	10/15/2018	10/16/2018	2/9/2020	481	\$27.00 DE	EMOCRATIC PARTY IERCE COUNTY	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100956515
1009	56518	3 C4	0		10/16/2018	10/29/2018	10/30/2018	2/9/2020	467	\$0.00 DE	EMOCRATIC PARTY	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100956518
1009	56519) C4	0		10/30/2018	11/30/2018	12/10/2018	2/9/2020	426	\$0.00 DE	IERCE COUNTY EMOCRATIC PARTY IERCE COUNTY	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100956519
1009	56521	L C4	0		12/1/2018	12/31/2018	1/10/2019	2/9/2020	395	\$145.47 DE	EMOCRATIC PARTY	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100956521
1009	34244	1 C3	0	9/30/2018			10/10/2018	10/1/2019	356	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100934244
1009	52605	6 C4	100921555		7/16/2019	7/29/2019	7/30/2019	1/8/2020	162	2 \$1,383.52 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952605
1009	52608	8 C4	100928961		7/30/2019	8/31/2019	9/10/2019	1/8/2020	120	\$714.61 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952608
1008	79765	5 C3	0	9/24/2018			10/1/2018	1/8/2019	99	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100879765
1009	52609) C4	100937536		9/1/2019	10/14/2019	10/15/2019	1/8/2020	85	\$687.46 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952609
1008	79767	7 C4	100867126		9/1/2018	10/15/2018	10/16/2018	1/8/2019	84	\$1,182.14 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100879767
1009	52610) C4	100942006		10/15/2019	10/28/2019	10/29/2019	1/8/2020	71	\$1,657.05 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952610
1008	79768	3 C4	100871481		10/16/2018	10/29/2018	10/30/2018	1/8/2019	70	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100879768
1009	28952	2 C3	0	7/31/2019			8/5/2019	9/8/2019	34	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100928952
1008	75762	2 C3	100871429	10/30/2018			11/5/2018	12/8/2018	33	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100875762
1009	52611	LC4	100949205		10/29/2019	11/30/2019	12/10/2019	1/8/2020	29	\$441.84 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952611
1008	79769) C4	100875916		10/30/2018	11/30/2018	12/10/2018	1/8/2019	29	\$7,639.51 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100879769
1009	52613	3 C3	0	11/14/2019			12/10/2019	1/8/2020	29	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952613
1009	52612	2 C3	0	11/15/2019			12/10/2019	1/8/2020	29	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952612
1009	52595	C3	100946905	11/15/2019			12/10/2019	1/8/2020	29	\$0.00 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100952595
1008	92996	6 C4	100883888		1/1/2019	1/31/2019	2/11/2019	3/9/2019	26	\$3,551.93 Ce	ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100892996
1008	92995	5 C3	100883255	1/31/2019			2/11/2019	3/9/2019	26		ierce County Democratic entral Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100892995

								Pierce County Democratic	
110163415 C4	0		7/1/2023	7/31/2023	7/11/2023	8/1/2023	21	\$64.78 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110163415
								Pierce County Democratic	
100958850 C3	0	1/16/2020			2/10/2020	3/1/2020	20	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100958850
								Pierce County Democratic	
100857498 C3	0	8/22/2018			8/27/2018	9/10/2018	14	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100857498
								Pierce County Democratic	
110048226 C3	110044558	8/30/2021			9/6/2021	9/19/2021	13	\$101.94 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=110048226
								Pierce County Democratic	
100936828 C3	0	9/24/2019			9/30/2019	10/13/2019	13	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100936828
								Pierce County Democratic	
110110942 C3	0	8/22/2022			8/29/2022	9/7/2022	9	\$20.00 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110110942
								Pierce County Democratic	
110108863 C3	0	8/17/2022			8/22/2022	8/29/2022	7	\$5.00 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110108863
								Pierce County Democratic	
110114554 C3	0	9/16/2022			9/19/2022	9/25/2022	6	\$0.04 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110114554
								Pierce County Democratic	
110114553 C3	0	9/15/2022			9/19/2022	9/25/2022	6	\$30.00 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110114553
								Pierce County Democratic	
100915921 C3	0	7/5/2019			7/8/2019	7/11/2019	3	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100915921
								Pierce County Democratic	
100921555 C4	0		7/16/2019	7/29/2019	7/30/2019	8/1/2019	2	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100921555
			0/4/0040		10/10/10010	10/10/2010	-	Pierce County Democratic	1
100867126 C4	100866722		9/1/2018	10/15/2018	10/16/2018	10/18/2018	2	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100867126
440002256.62		E /42 /2022			c /4 0 /2022	C /4.2 /2.022	2	Pierce County Democratic	111 // 11 1 // 111 // 11 11 // 11 11 // 11 11
110092356 C3	Ü	5/13/2022			6/10/2022	6/12/2022	2	\$5.10 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110092356
11002240464	0		C /1 /2021	7/42/2024	7/12/2021	7/14/2021	4	Pierce County Democratic	https://wwh.ada.us.ass/astissa/dafa.uh.assu.2assa.ass/440032404
110033484 C4	0		6/1/2021	//12/2021	7/13/2021	7/14/2021	1	\$723.31 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=110033484
100898694 C4	100898044		2/1/2010	2/21/2010	4/10/2019	4/11/2010	1	Pierce County Democratic \$3,535.41 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100898694
100090094 C4	100696044		5/1/2019	3/31/2019	4/10/2019	4/11/2019	-	Pierce County Democratic	nttps://web.puc.wa.gov/rptimg/uerauit.aspx:repno=100698694
100871481 C4	0		10/16/2018	10/20/2019	10/20/2019	10/21/2019	1	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100871481
1008/1481 C4	O		10/10/2018	10/25/2016	10/30/2018	10/31/2018	1	Pierce County Democratic	nttps://web.puc.wa.gov/iptimg/uerauit.aspx:Tepiio=100671461
100866722 C4	0		0/1/2018	10/15/2018	10/16/2018	10/17/2018	1	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100866722
100000722 C4	U		3/1/2010	10/13/2010	10/10/2010	10/1//2010	1	Pierce County Democratic	https://web.puc.wa.gov/rptinig/default.aspx:Tephio=100000722
110120115 C3	n	10/13/2022			10/17/2022	10/18/2022	1	\$25.00 Central Committee (PCDCC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110120115
110120113 03		10/ 10/ 2022			-0/1//2022	10/10/2022		Pierce County Democratic	Transport and the second secon
100861017 C3	0	9/18/2018			9/24/2018	9/25/2018	1	\$0.00 Central Committee (PCDCC)	https://web.pdc.wa.gov/rptimg/default.aspx?repno=100861017
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