

Respondent Name
Kate Martin
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Thu, 26 Oct 2023 at 2:08 AM)</p> <p>To whom it may concern,</p> <p>It has come to my attention that Seattle City Council candidate Kate Martin has committed violations of Washington State's campaign finance laws (RCW 42.17A). The details are as follows:</p> <p>1) Complete failure to accurately report expenditures (Violation of RCW 42.17A.235, .240)</p> <p>This failed Seattle City Council candidate during her 2019 campaign appears to have falsified her C4 (expenditure report) by claiming to have spent \$5,062,019 on "food for campaign event" at "La Conasupo" restaurant in Seattle (See PDC C4 Tracking # 100910201, attached for staff reference). While this politician may have frequently wasted and squandered campaign cash on foolish expenditures, it appears unlikely that anyone could buy that much food from that restaurant – even if they bought food for every homeless encampment and drug addict in Seattle for the year, it would be very difficult to squander that much cash on "food for campaign event."</p> <p>It clearly appears this politician has broken the law by concealing the truth about her campaign's finances in her 2019 campaign. I will also point out for the record that this C4 (expenditure report) clearly indicates a negative balance on Line 18 of \$5, 063.620.45, which is impossible because, as the report itself so clearly indicates – Line 18, MUST match the bank account balance at the time this report was filed. Clearly it did not.</p> <p>Usually this indicates unreported contributions to the campaign that have not been disclosed to the public, but we can't know for sure until this politician is able to go back and report the truth about what they did with the missing cash stash. In this case, I'd assume that this politician simply reported false information on their massive "food for campaign event." Maybe it is time for her to come clean and tell the truth now?</p> <p>The violation here is obvious and self-evident. The answer to the questions raised in this complaint are not so obvious. Clearly, this candidate must go back and resolve these questions. It is always better to come clean and tell the truth, so clearly she needs to go back and correct this obviously flawed report.</p> <p>I realize that this politician is currently being investigated by the PDC for earlier violations she committed which I have reported a few months ago (See PDC Enforcement Case #141651), however, that is no excuse to continue to break the law and make it worse now.</p> <p>Let me know if you need anything else here.</p> <p>Best Regards,</p> <p>Glen Morgan</p> <p>(For Internal PDC Staff reference – based on my written testimony submitted to the PDC last month, I am counting this as complaint #12 for October)</p>
What impact does the alleged violation(s) have on the public?
The public probably knows that a \$5 million expense report for "campaign food" is wrong, but does this politician?
List of attached evidence or contact information where evidence may be found
C4 attached
List of potential witnesses with contact information to reach them
The candidate and their treasurer for sure
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.

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
 100910201
 AMENDS
 100900662
 06-11-2019

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

KATE MARTIN (Put Kate on the Council)

Mailing Address

412 NW 73rd St

City

Seattle, WA

Zip + 4

98117

Office Sought (Candidates)

CITY COUNCIL MEMBER

Election Date

2019

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?

Report Period Covered

From (last C-4)

05/01/19

To (end of period)

05/31/19

Final Report?

Yes No **X**

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	\$9,592.84
2. Cash received (From line 2, Schedule A)	\$	\$3,834.87
3. In kind contributions received (From line 1, Schedule B)		\$0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		\$3,834.87
5. Loan principal repayments made (From line 2, Schedule L)		\$0.00
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 campaign (Combine lines 1, 4 & 7)		\$13,427.71
9. Total pledge payments due (From line 2, Schedule B)	\$0.00	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		\$10,399.75
11. Total cash expenditures (From line 4, Schedule A)		\$5,066,648.41
12. In kind expenditures (goods & services) (From line 1, Schedule B)		\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		\$5,066,648.41
14. Loan principal repayments made (From line 2, Schedule L)		\$0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		\$5,077,048.16

CANDIDATES ONLY	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:

(206) 579-3703

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	(\$5,063,620.45)
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	\$4,507.16
20. Balance (Surplus or deficit) (Line 18 minus line 19)	(\$5,068,127.61)

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

Candidate's Signature	Date	Treasurer's Signature	Date
KATE MARTIN	06/11/19	Kate Martin	06/11/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4

A
(11/93)

2

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

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

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
05/01/2019	\$40.00	05/13/2019	\$75.00	05/09/2019	\$40.00	
05/01/2019	\$80.00	05/10/2019	\$210.00	05/03/2019	\$70.00	
05/07/2019	\$60.00	05/07/2019	\$30.00	See attached		

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$3,834.87**

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

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

CODE
DEFINITIONS
ON NEXT PAGE

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

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

3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
05/02/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$4.25
05/02/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.09
05/02/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.09
05/02/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.09
05/05/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$4.25
05/06/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.88

Total from attached pages \$ **\$5,066,634.76**

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ **\$5,066,648.41**

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
05/06/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.09
05/07/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$2.28
05/13/19	VALPAK 2211 Elliott Ave 200 Seattle, WA 98121		advertising flyer	\$1,622.29
05/14/19	KING COUNTY ELECTIONS 919 SW Grady Way Ste 100 Renton, WA 98057		filing fee to king county elections	\$1,262.58
05/13/19	UPWORK 475 Brannan Street, Suite 430 San Francisco, CA 94107		tech assistance for website	\$202.50
05/13/19	PORKCHOP AND COMPANY 5451 Leary Ave NW Seattle, WA 98107		lunch meeting with paul	\$38.82
05/13/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$16.75
05/09/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$7.99
05/08/19	FREMONT CHAMBER 720 N 35th St #206 Seattle, WA 98103		fee for candidating at the park	\$25.00
05/06/19	FRELARD TAMALES 6412 Latona Ave NE Seattle, WA 98115		food for campaign event	\$187.65
05/06/19	LA CONASUPO 8532 Greenwood Ave N Seattle, WA 98103		food for campaign event	\$5,062,019.00
05/06/19	SMART FOODSERVICE Store # 562 Seattle, WA 98117		food for campaign event	\$159.44

Page Total ~~\$5~~,065,545.39

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 4

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

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
05/06/19	FRED MEYER 100 NW 85th St Seattle, WA 98117		food for campaign event	\$7.76
05/03/19	AUTOMATTIC JETPACK 60 29th Street #343 San Francisco , CA 94110		website app	\$9.00
05/01/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$8.62
05/06/19	FRED MEYER 100 NW 85th St Seattle, WA 98117		food and beverages for campaign event	\$182.96
05/20/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		transaction fee	\$1.49
05/20/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		transaction fee	\$2.28
05/20/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		transaction fee	\$20.05
05/31/19	CITY OF SEATTLE 600 4th Ave Seattle, WA 98104		parking	\$2.53
05/28/19	ALEXANDRE HARRIS 412 NW 73rd St Seattle, WA 98117		DVP signatures at market	\$40.00
05/31/19	TYLER HARRIS 412 NW 73rd St Seattle, WA 98117		photo/video services	\$250.00
05/28/19	THE ROCKET SCIENCE GROUP LLC 675 Ponce De Leon Ave NE Suite Atlanta, GA 30308		email app	\$19.82
05/28/19	USPS Greenwood Ave N Seattle, WA 98103		stamps	\$65.00

Page Total \$ \$609.51

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 5

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

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
05/28/19	FRED MEYER 100 NW 85th St Seattle, WA 98117		mailing supplies	\$10.98
05/28/19	TUMELIUS MEDIA 1020 1st Avenue South Seattle, WA 98134		photo/video	\$275.25
05/24/19	CITY OF SEATTLE 600 4th Ave Seattle, WA 98104		parking	\$7.00
05/23/19	FINNEGAN POPE 3253 27th Ave W Seattle, WA 98199		DVP signatures	\$40.00
05/28/19	MAKEMYNEWSPAPER.COM 2114 W Grant Rd, Tucson, AZ Tucson, AZ 85745		web app	\$99.00
05/21/19	CITY OF SEATTLE 600 4th Ave Seattle, WA 98104		parking	\$4.50
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$9.23
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$8.74
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$6.48
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$5.41
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$4.44
05/20/19	UBER 1455 Market St San Francisco, CA 94103		rideshare	\$4.37

Page Total \$ \$475.40

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 6

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

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
05/25/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$2.28
05/24/19	WE PAY 455 Portage Avenue, Suite B Palo Alto, CA 94306		processing fee	\$1.09
05/23/19	LARRY HEBERLEIN 6041 Palatine Ave N Seattle, WA 98103		processing fee	\$1.09

Page Total \$ \$4.46

Attachment to Schedule A Additional Deposits

for the period: 05/01/19 05/31/19

7

Name

KATE MARTIN (Put Kate on the Council)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
05/14/19	\$2,884.87				
05/28/19	\$290.00				
05/28/19	\$10.00				
05/27/19	\$20.00				
05/28/19	\$25.00				

LOANS

SCHEDULE TO C4

L

(12/99)

8

Candidate or Committee Name

Report Date

KATE MARTIN (Put Kate on the Council)

05/01/19

05/31/19

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
04/12/19	KATE MARTIN 412 NW 73rd St Seattle, WA 98117	\$1,622.29	\$0.00	\$1,622.29
05/13/19	KATE MARTIN 412 NW 73rd St Seattle, WA 98117	\$1,622.29	\$0.00	\$1,622.29
05/14/19	KATE MARTIN 412 NW 73rd St Seattle, WA 98117	\$1,262.58	\$0.00	\$1,262.58
			Subtotal This Page	\$4,507.16