

To whom it may concern,

I write you to complain that there is good reason to believe several violations of chapter 42.17A RCW, Washington State's campaign finance law, have been committed by the Pierce County Republican Party (the "Respondent") between 2015 and the present. I am presenting the substance of this complaint to the Pierce and Thurston county prosecuting attorneys and the Attorney General's Office today as a citizen action notice.

The apparent violations include failures to report tens of thousands of dollars in orders placed and expenditures until after the 2016 general election, for services apparently ordered during the campaign season prior to November 2016. Additionally, approximately \$98,053.65 or more worth of orders placed, debts, obligations, and loans have gone unreported, some for significant periods of time. On several occasions detailed in this notice, the Respondent has apparently deprived the public of the right to timely know what services it has ordered and expenditures it has committed to paying.

The Respondent has apparently violated chapter 42.17A RCW as follows:

A. Failures to timely file Public Disclosure Commission form C-4 reports ("Summary, Full Report Receipts and Expenditures")

The Respondent failed to timely file at least twelve Form C-4 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, on the following occasions (bold and underlined dates indicate when Respondent's form C-4 reports were filed):

1. **July 9, 2017**. This report, for May 1-31, 2017, was due June 12, 2017, and was 27 days late.
2. **May 9, 2017**. This amended form C-4 report, for March 1-31, 2016, was due April 10, 2017, and was 29 days late.
3. **March 15, 2017**. This report, for January 1-31, 2017, was due February 10, 2017, and was 33 days late.
4. **February 5, 2017**. This report, for December 1-31, 2016, was due January 10, 2017, and was 26 days late.
5. **January 15, 2017**. This report, for November 1-30, 2016, was due December 12, 2016, and was 34 days late.
6. **January 15, 2017**. This single report was filed long after the general election to which it relates, and covers the entire month of October 2016. Two reports were due for October, for reporting periods ending October 17, 2016, and stretching from October 18-31, 2016, respectively. As such, Respondent's report was at least 89 days late as to the first October reporting period (during which it made tens of thousands of dollars in expenditures, including a single \$37,000 expenditure to the political committee Friends of Steve O'Ban), and 75 days late as to the latter period. However, the Respondent is still delinquent in failing to file at least one required report for this month, as the two pre-general election reports are both required by law. RCW 42.17A.235(2)(a). Unitemized expenditures must be disaggregated between the two reporting periods.
7. **October 20, 2016**. This report, for August 1-31, 2016, was due September 12, 2016, and was 38 days late.
8. **August 12, 2016**. This single report was filed after the primary election to which it relates, and covers the entire month of July 2016. No less than two reports were due for July, for reporting periods ending July 11, 2016, and stretching from July 12-25, 2016, respectively. As such, Respondent's report was at least 31 days late as to the first July reporting period, and 17 days late as to the latter period. However, the Respondent is still delinquent in failing to file at least one required report for this month, as the two pre-primary election reports are both required by law. RCW 42.17A.235(2)(a). Unitemized expenditures must be disaggregated between the two reporting periods.
9. **Nonexistent form C-4**. A form C-4 report for the period from December 1-31, 2015 was due to be filed by January 11, 2016. This report was due because over \$200 in reportable contribution and expenditure activity took place during the reporting period. RCW 42.17A.235(1). For example, Respondent's form C-3 filed January 11, 2016 shows over \$5,500 in contributions was received and deposited during December 2015, yet this activity was never reported on form C-4 as required by law. See Respondent's form C-4 filed February 17, 2016, 2 (Cash Receipts section calls for disclosure of all contributions since last C-4 report, yet Respondent omits over \$5,500 in contributions reportable during December 2015). Additionally, reportable debts and obligations exceeding \$250 in value should have been reported on form C-4, Schedule B during December 2015. See **Section B, Allegation** below (summarizing unreported debts and obligations in existence during December 2015). Respondent has not filed any form C-4 report for December 2015 to date.

10. **November 9, 2015.** This report, for October 13-26, 2015, was due October 27, 2015, and was filed one day before the general election, making it 13 days late.

B. Failures to report expenditures or in-kind contributions; orders, debts, and obligations; and in-kind loans, in Public Disclosure Commission form C-4 reports and Schedules B ("In Kind Contributions, Pledges, Orders, Debts, Obligations") L ("Loans")

The Respondent filed no identifiable Schedule B or Schedule L reporting from 2015 through April 2017. It apparently failed to timely report certain contribution and expenditure activity, and to file Schedules B and L reports attached to its Forms C-4, as required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, on several occasions. A list of ten specific allegations, including nineteen apparent violations of the campaign finance law, is attached as Appendix A. The volume of unreported debts and obligations apparently exceeds \$98,053.65.

Thank you for your attention to this complaint.

Best regards,

Walter Smith

September 1 - 24

September 1, 2017 10:30:00 PDT 50 days 23 hrs 25 mins 25 secs Until State Fair



ABOUT US

THE PLACE THAT BRINGS PEOPLE TOGETHER, GENERATION AFTER GENERATION.

The Washington State Fair is the largest single attraction held annually in the state of Washington. The Fair continually ranks as one of the largest fairs in the world. The Washington State Fair hosts two annual events, the 20-day Washington State Fair every September, and the four-day Spring Fair in Puyallup every April.

Situated south of Seattle and east of Tacoma in the shadow of majestic Mount Rainier, the Washington State Fair Events Center comprises 169+ acres, with buildings and land valued at more than \$54 million. The facilities are available for rent during the year, making the grounds a valuable community resource. A staff of 55 works year-round. Over 1,900+ employees are hired each September during the Fair.

- [Donation Policy](#)

The Washington State Fair is a private, not-for-profit, 501-C3 corporation. It receives no government subsidy, and pays city and state taxes. Any proceeds are invested back into the Fair for improvements.

The State Fair of Washington - Do the Puyallup

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Rebranding Story

2016 Fair Date Expansion FAQ

Social Media Policy

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MOBILE APP





Pierce County Republican Party added an event.

November 9, 2015 · 🌐

Social Hour begins at 5:30 pm

Program/Dinner begins at 6:30 pm with a meal choice of Prime Rib or Salmon

Cost is \$50 with Early Registration at this link with online payment available also. (Cost is \$60 per person after December 2nd and at the door)

If you would like to host a table of 10, please let Connie Coleman-Lacadie know by email at connie.coleman-lacadie@piercegop.org... [See More](#)



DEC **PCRP Christmas Party**

5

Sat 5:30 PM PST

19 people went

Like

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Pierce County Republican Party

November 9, 2015 · Tacoma, WA ·

Our Annual **Christmas** Party will be an evening of Celebration, Dinner and Friendship! There will be a variety of festivities to enjoy and a wonderful dinner at the beautiful Tacoma Golf & Country Club. This truly is a Time for Hope! Also meet many of our announced 2016 candidates. RSVP at the link below!



Our Annual **Christmas** Party | PierceGOP

Social Hour begins at 5:30 pm and the Program/Dinner begins at 6:30 pm with a meal choice of Prime Rib or Salmon

PIERCEGOP.ORG



Pierce County Republican Party added an event.

December 4, 2015 · 🌐

Join us March 12th for our annual **Lincoln** Day Celebration. Tickets and online registration is available at www.PierceGOP.org/lincoln-day



Pierce County Republican Party
Lincoln Day Dinner & Auction
Saturday, 3.12.16

with Special Guest Speaker Freedom Foundation CEO,
Tom McCabe

www.PierceGOP.org/lincoln-day

MAR

12

PCR **Lincoln** Day Dinner

Sat 5:00 PM PST · La Quinta Inn & Suites Tacoma Seattle · Tacoma...

40 people interested

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[Pierce County Republican Party](#)

August 18, 2016 · 🌐

Join us Saturday, September 3rd for an evening of coming together with Guest Speaker Todd Herman. You've heard him on KTTH770 in the afternoon, Come hear him in person! Join Elected Officials, Candidates and Republican friends! Enjoy Dinner - Music - **Dancing!** RSVP Today at ow.ly/nqYC303nIVL The event is being held at the Tacoma Elks Lodge on the Allenmore Golf Course.

Pierce County Republicans

An Evening to Come Together

Dancing with Elephants

You are invited to our annual unity gathering!



With featured speaker
Todd Herman
Radio Host on KTTH

Dinner Dance
Dinner - Music - Dancing

Join our electeds, candidates and Pierce County Republicans!



Growth - Opportunity - Prosperity

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Calendar

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September 2016								
<<	Sun	Mon	Tue	Wed	Thu	Fri	Sat	>>
28		29	30 Trump Rally in Everett!	31	1	2 Washington State Fair – Republican Booth	3 Washington State Fair – Republican Booth Pierce County Republicans coming together Dinner Dance	
	4 Washington State Fair – Republican Booth	5 Washington State Fair – Republican Booth	6	7 Pierce County Council Candidates Forum Washington State Fair – Republican Booth Commander-in-Chief Forum – airing twice 2/29 Republican Club	8 Washington State Fair – Republican Booth WSRP Annual Fall Dinner	9 Washington State Fair – Republican Booth Tacoma-Pierce County Chamber Luncheon Candidates Forum	10 Washington State Fair – Republican Booth 28th District Republican Club General Meeting JT Wilcox Annual Salmon Bake	
	11 Washington State Fair – Republican Booth	12 Washington State Fair – Republican Booth East Pierce Republican Women	13 30th District Breakfast Meeting 27th District PCO Meeting	14 Washington State Fair – Republican Booth	15 Washington State Fair – Republican Booth Lakewood Republican Women – Evening in Tacoma South Sound Republicans Candidates' Night	16 Washington State Fair – Republican Booth	17 Constitution Day Washington State Fair – Republican Booth 26th LD Super Saturday for Dammeler, Young and Bryant! Supporting the re-election of Jim McCune, Pierce County Council #3	
	18 Washington State Fair – Republican Booth	19 Washington State Fair – Republican Booth	20 Reception in support of re-electing Kim Wyman	21 Washington State Fair – Republican Booth LWV Pierce County Executive Forum	22 Washington State Fair – Republican Booth Pierce County Sheriff's Public Safety Strategy Event	23 Washington State Fair – Republican Booth	24 26th District Republican Club Washington State Fair – Republican Booth	
	25 Washington State Fair – Republican Booth 30th District Spaghetti Dinner	26 25th District Republican Club Trump – Clinton Presidential Debate Watch Party 26th District Republicans Debate Watch Party Pierce County Sheriff's Public Safety Strategy Event	27	28 Melanie's Birthday Bash LWV Pierce County District 6 Forum	29	30	1	

TOGETHER WE MAKE THE DIFFERENCE!



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CALENDER OF EVENTS

Jul 2017

S	M	T	W	T	F	S
<u>25</u>	<u>26</u>	<u>27</u>	<u>28</u>	29	30	1
2	3	<u>4</u>	5	<u>6</u>	7	8
9	<u>10</u>	<u>11</u>	<u>12</u>	13	14	15
16	17	18	19	<u>20</u>	21	<u>22</u>
23	<u>24</u>	25	26	<u>27</u>	28	29
30	31	1	2	<u>3</u>	4	5

QUICK INFORMATION



EVENT SUBMISSION FORM

Contact Information:

(253) 722-5353

PierceGOP@PierceGOP.org

Our offices are located
[4218 S. Steele Street, Suite 304 Tacoma, WA 98409](#)

Recent Posts

- [Lincoln Day – 2017 Awards Recipients](#) May 28, 2017
- [Washington State Legendary Women's Suffrage Leader \(and a Republican\)](#) May 20, 2017
- [Capital Gains Disaster](#) May 15, 2017
- [State Senate Republicans introduce new bold bill](#) March 19, 2017
- [#FakeNews Breakdown](#) February 12, 2017

Tweets by @piercegop



Pierce GOP
@piercegop

Many have asked "What can be done" about #ST3 New initiative launched to toss Sound Transit car-tab taxes thenewstribune.com/news/politics-...

[Embed](#)

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What is Happening!

- [Pierce County Supports Jinyoung Lee Englund](#)
July 11, 2017 | 6:00 pm - 8:00 pm
- [2/29 Republican Club Stump Speech BBQ event](#)
July 12, 2017 | 6:00 pm - 8:15 pm
- [30th District Picnic](#)
July 20, 2017 | 6:30 pm - 8:30 pm
- [26th District Republican Club Meeting](#)
July 22, 2017 | 8:30 am - 10:30 am



Pierce County Republican Party

November 3, 2016 · 🌐

Election comes to an end with your vote by Tuesday at 8pm! Followed up with our Election party that is free to attend in Lakewood on November 8th starting at 7pm RSVP today at: [ow.ly/jmoE305Pjqj](https://www.facebook.com/jmoE305Pjqj) Then the Our **Christmas** Party is being held on Saturday evening, December 3rd details here [ow.ly/pW4X305PjZn](https://www.facebook.com/pW4X305PjZn) RSVP will be available soon

Pierce County Republican Party

You are Cordially Invited to our Annual Christmas Party!

An Evening of Celebration
Dinner and Gathering with Friends!

Saturday, December 3rd
at the Tacoma Golf & Country Club

13204 Country Club Drive SW, Lakewood, Wa 98498

Social Hour begins at 5:30 pm
Program/Dinner begins at 6:30 pm

👍 Like

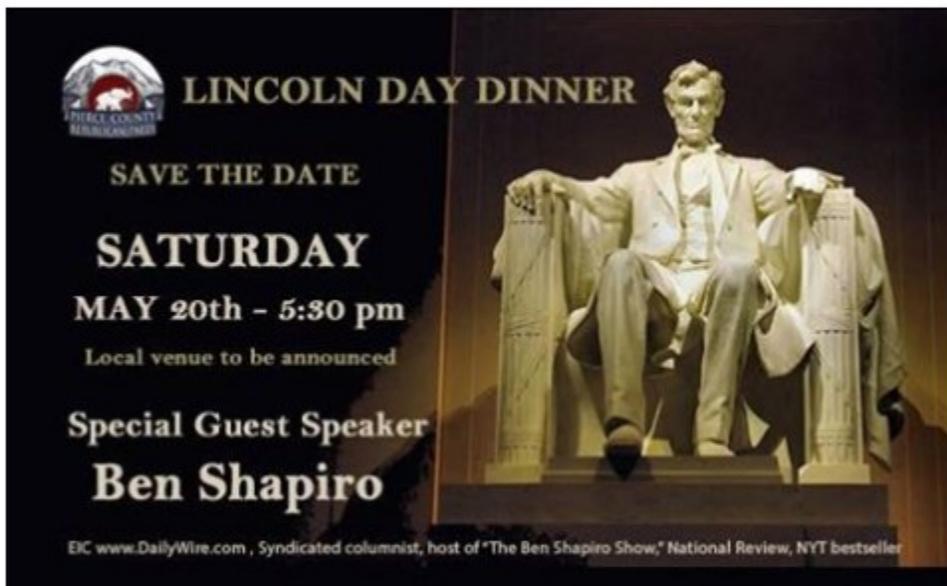
💬 Comment



Pierce County Republican Party

February 1 · 🌐

SAVE the DATE for our Lincoln Dinner being held on Saturday, May 20th this year with our guest speaker Ben Shapiro! More information coming, but you will want to have this marked on your calendar! The event will be updated at goo.gl/GFYdrz when finalized



Like



Comment

Jennie Stephenson, Mat Kordell, Sandra LaCelle and 5 others like this.

1 share



Pierce County Republican Party

March 15 · 🌐

Our Lincoln Day Dinner event is being held on Saturday, May 20th, with Guest Speaker Ben Shapiro! Online Registration available at the link below. Two levels of tickets available for the evening. Choose from Dinner Tickets and VIP tickets. RSVP today at this link: goo.gl/W4dUm9

The poster features a central image of the Lincoln Memorial statue. To the left of the statue, the text reads: "SATURDAY - MAY 20th", "Greater Tacoma Convention & Trade Center", "VIP Reception - 5-6 pm", "Social - 5:30 pm", and "Dinner - 6:30 pm". Above the statue, the text reads: "LINCOLN DAY DINNER". Below the statue, the text reads: "Guest Speaker - Ben Shapiro". At the bottom left, there is a small logo for the Pierce County Republican Party and a line of fine print: "EIC www.DailyWire.com, Syndicated columnist, host of 'The Ben Shapiro Show,' National Review, NYT bestseller Author".

👍 Like 💬 Comment

Dawn Offerman Merila, David Silliman, Kalup Veneman and 4 others like this.

Chronological ▾

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

1. Unreported orders, debts, and obligations, and in-kind loan, for 2017 Lincoln Day Dinner.

Respondent held a major event called the Lincoln Day Dinner at the Tacoma Convention Center on May 20, 2017, including a dinner and fundraising auction. An amended form C-4 Respondent filed on March 15, 2017 shows a payment of \$900 on February 28, 2017 to the Tacoma Convention Center for "Event Venue," which was to reserve space for the Lincoln Day Dinner in May. In its C-4 filed May 15, 2017, Respondent corrected the reported \$900 expenditure, changing it to zero, and instead, reported a payment dated April 19, 2017 to James Jensen to "Reimburse Venue deposit - Tacoma Conv Ctr." However, Respondent failed to amend its earlier reporting to show any in-kind loan by Mr. Jensen for the deposit amount or any debt to the venue for the balance of the event fee; apparently, Schedule B or L would have been due by the deadline for February 2017 form C-4 reporting. Additionally, Respondent failed to report paying the balance of the venue fee after the initial deposit; its reporting must be amended to correct this error with either an identified expenditure or in-kind contribution for the unknown balance of the venue fee.

A later form C-4 filed after the Lincoln Day event reveals additional activity which should have been reported on Schedule B because orders were apparently placed prior to the May 2017 reporting period and exceeded \$250 in value. For example, the form C-4 filed on July 9, 2017 shows \$5,000 paid to the Tacoma Convention Center for "Event catering" on May 9, 2017, and another payment to the same vendor for the same purpose totaling \$4,094.26 on May 18, 2017. To the extent Respondent ordered these services prior to May 2017, they should have been reported earlier as orders, debts, or obligations.

Finally, Schedule B to the form C-4 filed July 9, 2017 shows a \$10,000 in-kind contribution for a speaker's fee for the Lincoln Day event, paid only after the Lincoln Day Dinner had occurred. It appears that, given the size of the event and the need to arrange the event in advance, the speaker's time was reserved in a prior reporting period. Additionally, Respondent promoted the Lincoln Day Dinner as early as February 1, 2017 on its Facebook page with the date and speaker identified; a post on March 15, 2017 announced the venue. See attached screenshots (showing February and March 2017 Facebook posts). However, no orders placed, debts, or obligations were reported until after the Lincoln Day event had occurred. To the extent these items were ordered prior to May 2017, they should have been reported earlier.

Summary of Five Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 1:

a) overdue Schedule L to form C-4 due by March 10, 2017 for \$900 in-kind loan for Lincoln Day Dinner deposit by Mr. Jensen (currently at least 126 days overdue and still outstanding);¹ **b)** overdue Schedule B to form C-4 due by March 10, 2017 to report unknown outstanding balance of Lincoln Day Dinner venue fee following deposit payment by Mr. Jensen (currently at least 126 days overdue and still outstanding); **c)** overdue amendment to form C-4

¹ In this citizen action notice, reports of orders, debts, obligations, and loans are noted as due "by" certain dates to the extent available information shows reporting was due *at or before* that time. However, the exact date the reports were due, and the corresponding delinquency period, can only be verified once the initial date of the order, debt, obligation, or loan is verified.

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

report/Schedule B to identify unknown expenditure or in-kind contribution to pay for balance of venue fee following payment of \$900 deposit (likely due by June 12, 2017, and currently at least 32 days overdue and still outstanding); **d)** overdue Schedule B to form C-4 due by May 10, 2017 to report order, debt, or obligation valued at approximately \$9,094.26 for catering services for Lincoln Day Dinner (currently at least 65 days overdue and still outstanding); **e)** overdue Schedule B to form C-4 due by April 10, 2017 to report \$10,000 order, debt, or obligation for speaker's fee for Lincoln Day Dinner (currently 95 days overdue and still outstanding).

2. Unreported orders, debts, and obligations for campaign worker services during 2016.

Respondent apparently failed to disclose \$32,249.69 worth of compensation to a staffing agency, private company, and 18 individual workers for campaign services as orders, debts, and obligations throughout the 2016 election campaign season. In the form C-4 filed February 5, 2017 for reporting period December 1-31, 2016, Respondent reported paying on December 30, 2016 over \$9,000 in "Compensation" to Professional Staff Northwest, a staffing agency in Puyallup. These expenditures, first reported well after the 2016 election, were apparently for services performed prior to the 2016 general election. As such, they were not timely reported as debts or obligations as required by law.

Additionally, the form C-4 filed January 15, 2017 for reporting period November 1-30, 2016, Respondent reported 42 expenditures for "Compensation" to 18 individuals and a vendor called the Lindholm Group in amounts as high as \$900 (and an additional \$7,827.55 to Professional Staff Northwest). To the extent these payments were compensation for services performed prior to November 2016, during the campaign season, the Respondent failed to timely report the activity as debts and obligations.

Summary of Unknown Number of Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 2: overdue Schedule B to form C-4 due by December 12, 2016 (and likely starting much earlier) to report approximately \$32,249.69 worth of orders, debts, and obligations for compensation for campaign services performed by various parties first disclosed in form C-4 filed February 5, 2017 (currently at least 214 days overdue and still outstanding).

3. Unreported expenditure or in-kind contribution for event space and unreported orders, debts, or obligations for 2016 Christmas party. According to the form C-4 filed February 5, 2017, an expenditure of \$3,720.09 for event catering was paid to the Tacoma Golf and Country Club on December 31, 2016. Respondent held its Christmas party at the venue on December 3, 2016. Respondent reported no expenditure for event space for the Christmas party, and no in-kind contributions received during 2016. To the extent Respondent reserved space at the Club for its Christmas party, it should have reported the value of the event rental as an expenditure or in-kind contribution. And to the extent that it reserved the space and/or ordered catering services before December 2016, it should have reported the transaction(s) as an order, debt, or obligation. In addition to the common sense reality that it is very difficult to line up space and catering services for a large Christmas party without significant advance

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

notice, see the attached Facebook posts showing Respondent advertised its Christmas party in a post as early as November 3, 2016. The space reservation and menu, at least, had apparently been ordered on or before that date.

Summary of Two Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 3:

a) overdue amendment to form C-4 report/Schedule B to identify expenditure or in-kind contribution to pay for venue space fee for 2016 Christmas party (likely due by January 10, 2017, and currently at least 185 days overdue and still outstanding); **b)** overdue Schedule B to form C-4 due by December 12, 2016 to report orders, debts, and obligations of at least \$3,720.09 for venue space and catering reserved ahead of 2016 Christmas party (currently at least 214 days overdue and still outstanding).

4. Unreported orders, debts, and obligations for September 2016 Dancing with

Elephants event. Respondent apparently failed to disclose its orders, debts, and obligations related to an event it held September 3, 2016 at the Allenmore Golf Course, called Dancing with Elephants. In the form C-4 filed October 21, 2016 for September 2016, Respondent reported paying vendors a total of \$4,498.10 for "Entertainment for event," "Event food," and an "Auctioneer" on September 8, 2016. These payments apparently related to the Dancing with Elephants event. No orders, debts, or obligations were earlier reported related to the event on Schedule B. It is highly doubtful that food, entertainment, and an auctioneer were reserved within 2 days prior to the event.

To the extent Respondent reserved these services prior to September 2016, and they were valued at greater than \$250, or greater than \$50 and were outstanding for over 30 days, they were not timely reported as debts or obligations as required by law. RCW 42.17A.240(8). Respondent advertised this event as early as August 18, 2016 on its Facebook page and apparently had ordered the services for the event by then; as such, it should have reported orders, debts, and obligations. See attached Facebook posting (listing venue and featured speaker).

Summary of Apparent Legal Violation of RCW 42.17A.235 and .240 under Allegation 4:

overdue Schedule B to form C-4 due by September 12, 2016 to report orders, debts, and obligations of at least \$4,498.10 for entertainment, food, and an auctioneer reserved ahead of Dancing with Elephants event (currently at least 305 days overdue and still outstanding).

5. Unreported orders, debts, and obligations for September 2016 Washington State Fair

event. Respondent apparently failed to disclose its orders, debts, and obligations related to renting space for a booth at the Washington State Fair during 2016. In the form C-4 filed June 12, 2016 for May 2016, Respondent reported paying the Fair \$225 for booth rental on May 12, 2016. Later, in a form C-4 filed August 12, 2016 (after the primary election), it reported a July 11, 2016 payment to the Fair of \$8,800 for "Rent for State Fair." Respondent apparently maintained a booth throughout the Fair's duration, from September 2 to 25, 2016. See attached Calendar (showing dates booth operated). To the extent Respondent reserved space for the

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

State Fair prior to July 2016, but paid the balance of its reservation cost at a later time, it was obligated to report the balance as an order, debt, or obligation on Schedule B but did not comply.

Summary of Apparent Legal Violation of RCW 42.17A.235 and .240 under Allegation 5: overdue Schedule B to form C-4 due by June 10, 2016 to report orders, debts, and obligations of \$8,800 for the balance of cost to reserve booth space at 2016 Washington State Fair (currently at least 399 days overdue and still outstanding).

6. Unreported orders, debts, and obligations for April 2016 county convention.

Respondent apparently failed to disclose its orders, debts, and obligations related to catering, space rental, and incidental expenses for its county convention held April 9, 2016. In the form C-4 filed May 11, 2016 for April 2016, Respondent reported paying \$10,532.21 to three parties for reimbursement for space rental for the convention, audio services, and catering. None of the activity was reported as an order, debt, or obligation, or as an in-kind loan, in any previous reporting period. Because Respondent apparently reserved space, catering services, or audio services for the county convention prior to April 2016 but paid (or received an in-kind contribution to satisfy) the balance at a later time, it was obligated to report the order, debt, or obligation on Schedule B but did not comply. See attached Facebook posting (dated March 18, 2016 and advertising venue and date of convention).

The reported reimbursement to Deryl McCarty in the amount of \$5,000 (on April 27, 2016) for "Rent for Convention" is unrelated to any in-kind loan reported prior to that date. To the extent that the Respondent received an in-kind loan in the amount of \$5,000, it must amend its reporting and disclose the transaction on Schedule L.

Summary of Two Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 6: **a)** overdue Schedule B to form C-4 due by April 11, 2016 to report orders, debts, and obligations of \$10,532.21 for space rental, audio services, and catering for party convention (currently at least 459 days overdue and still outstanding); **b)** overdue Schedule L to form C-4 due by April 11, 2016 to report in-kind loan of \$5,000 for space rental for party convention (currently at least 459 days overdue and still outstanding).

7. Unreported expenditures/in kind contributions, and orders, debts, and obligations for March 2016 Lincoln Day Dinner.

Respondent apparently failed to disclose its expenditures made or in-kind contributions received for dinner and auction costs; and orders, debts, and obligations related to catering, space rental, and auction costs for its Lincoln Day Dinner held March 12, 2016. In the form C-4 filed April 12, 2016 for March 2016, Respondent reported paying \$3,663.91 to La Quinta Inn for "Lincoln Day event." See *a/so* form C-4 filed December 15, 2015 (\$250 paid to La Quinta Inn for "Event rental downpayment" on November 20, 2015). A Facebook posting on Respondent's page dated December 4, 2015 announced the event would be taking place and described it as the "Lincoln Day Dinner & Auction." Attached detail from Facebook page, December 4, 2015. No reporting identified any auction items donated as

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

in-kind contributions, or expenditures to pay for such items; nor were expenditures or in-kind contributions disclosed for the cost of the dinner apparently served that day.

Additionally, none of the activity was reported as an order, debt, or obligation, or as an in-kind loan, in any reporting period. To the extent Respondent reserved space, catering services, or other incidental services for the Lincoln Dinner prior to March 2016 but paid the balance or received an in-kind contribution to cover the same at a later time, it was obligated to report the order, debt, or obligation on Schedule B. To the extent Respondent received in-kind contributions for auction items or other incidental goods and services, such as catering, for the Lincoln Day Event, it was required to disclose those transactions on Schedule B.

Summary of Two Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 7:

a) overdue amendment to form C-4 or Schedule B to form C-4 due by April 11, 2016 to report expenditures or in-kind contributions of unknown value for dinner and auction costs for 2016 Lincoln Day Dinner (currently at least 459 days overdue and still outstanding); **b)** overdue Schedule B to form C-4 due by December 10, 2015 to report order, debt, or obligation of \$3,663.91 for balance of cost to rent space for 2016 Lincoln Day Dinner (currently at least 582 days overdue and still outstanding).

8. Unreported orders, debts, and obligations for December 2015 Christmas party.

Respondent apparently failed to disclose its orders, debts, and obligations related to catering and event space rental for its Christmas party held December 5, 2015. In the form C-4 filed February 17, 2016 for January 2016, Respondent reported paying \$4,831.63 to Tacoma Golf & Country Club for "Event rental" on January 20, 2016. As noted elsewhere in this Citizen Action Notice, Respondent did not file a form C-4 report in December 2016.

Event space and the dinner menu were evidently ordered ahead of time; Facebook postings on Respondent's page dated November 9, 2015 announced the Annual Christmas Party would be taking place at the Tacoma Golf and Country Club on December 5, 2015, "with a meal choice of Prime Rib or Salmon." Attached detail from Facebook page, November 9, 2015. No reporting identified any expenditure or in-kind contribution for catering, or to provide the dinner. Nor did Respondent disclose the event space rental as a debt or obligation despite apparently reserving the space well in advance of the Christmas party.

Summary of Two Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 8:

a) overdue Schedule B to form C-4 due by December 10, 2015 to report order, debt, or obligation of \$4,831.63 for cost to rent space for 2015 Christmas party (currently at least 582 days overdue and still outstanding); **b)** overdue amendment to form C-4 or Schedule B to form C-4 due by December 10, 2015 to report expenditures or in-kind contributions of unknown value for dinner or catering costs for 2015 Christmas party (currently at least 582 days overdue and still outstanding).

Appendix A (July 14, 2017 Citizen Action Notice against Pierce County Republican Party)

9. Other unreported orders, debts, and obligations reportable during December 2015. As

noted above, Respondent did not file a form C-4 report in December 2015; it did, however, apparently make additional reportable expenditures that month beyond those already noted. In the form C-4 filed February 17, 2016 for January 2016, Respondent reported that on New Year's Day, it paid \$554 for Bumper Stickers to the Snohomish County Republican Party, and \$676.39 for Printing to Pacific Automation. No previous debts, orders, or obligations were reported for these transactions. Because it is practically impossible for Respondent to order these services on New Year's Day and pay for them in the same reporting period, these transactions were almost certainly orders placed in a prior period, and were reportable as debts, orders, or obligations on Schedule B in or before the December 2015 reporting period.

Summary of Apparent Legal Violation of RCW 42.17A.235 and .240 under Allegation 9:

overdue Schedule B to form C-4 due by January 11, 2016 to report order, debt, or obligation of \$1,230.39 for cost of bumper stickers and printing (currently at least 550 days overdue and still outstanding).

10. Unreported orders, debts, and obligations for Washington State Fair booth in 2015.

Respondent apparently reserved a booth for the 2015 Washington State Fair and failed to report any order, debt, or obligation related to the transaction, although it apparently did not discharge the full balance of its obligation until later reporting periods. In the form C-4 filed July 11, 2015, Respondent reported paying "Booth rental expense" in the amount of \$4,300 to the Fair on June 3, 2015. This amount was less than half what it cost to rent a booth at the Fair in 2016, and apparently represents partial payment for the booth Respondent reserved in 2015. See form C-4 filed August 12, 2016 (July 11, 2016 payment of \$8,800 for Fair booth). Later, on October 17, 2015, Respondent reported paying \$93.50 to the Fair on September 2, 2015 for "State Fair Event expense." And finally, in a form C-3 contributions report filed November 9, 2015, Respondent reported receiving a **contribution** of \$3,439.87 from the Washington State Fair dated October 2, 2015.

The Washington State Fair is a tax-exempt entity under Internal Revenue Code Section 501(c)(3), and is forbidden from making political contributions by law. See attached detail from Fair website (describing fair as a "private, not-for-profit, 501-C3 corporation"). If Respondent misattributed the October 2, 2015 contribution to the Fair, it must amend its reporting to correct the error. If Respondent did receive a contribution of over \$3,000 from the Fair, it would appear that federal tax laws have been violated. Furthermore, the series of transactions suggests that Respondent should have reported orders placed, debts, and obligations related to the balance due on its reservation of a booth at the Fair after its initial report of the \$4,300 payment. It appears that the Fair may have granted Respondent forgiveness of any balance due, which Respondent reported as a contribution; if this is the case, the waiver should have been reported as an in-kind contribution on Schedule B.

Summary of Two Apparent Legal Violations of RCW 42.17A.235 and .240 under Allegation 9:

a) overdue Schedule B to form C-4 due by July 14, 2015 to report order, debt, or obligation in

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amount of remaining balance of booth rental cost for 2015 Washington State Fair, valued at approximately \$3,533.37 (currently at least 731 days overdue and still outstanding); **b)** amendment to form C-4, or Schedule B to form C-4, due by October 13, 2015 to report expenditure or in-kind contribution to Respondent by Washington State Fair, to discharge outstanding balance for Respondent's 2015 Fair booth rental (currently at least 630 days overdue and still outstanding).