

## File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) reported 9 days ago (Sun, 25 Jun at 11:54 PM) via Portal [Meta](#)

To whom it may concern,

It has come to my attention that a wide variety and quantity of violations of RCW 42.17A may have been committed by Hillary Franz during her successful 2016 campaign for Washington State Commissioner of Public Lands. The details of these violations are as follows:

**(1) Failure to timely file a C3 report on the day the treasurer is designated (Violation RCW [42.17A.235\(1\)](#)) states that “on the day the treasurer is designated, each candidate or political committee must file with the commission a report of all contributions received and expenditures made prior to that date, if any.”**

Franz filed her [C1 Report](#), which designated Abbot Taylor as her treasurer, on 4/27/16. Ms. Franz violated RCW [42.17A.235\(1\)](#) by failing to timely report an expenditure made prior to that date.

· Ms. Franz contributed \$250 of her personal funds on 4/22/16. Rather than reporting the contribution on 4/27/16, Ms. Franz reported it 13 days late on 5/10/16 (see Report No. [100694409](#)).

**(2) Failure to timely file accurate C3 and C4 reports (Violation of RCW 42.17A.235). RCW 42.17A.235 requires candidates and committees to file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Franz violated this statute as follows:**

- Ms. Franz reported receiving a \$4000 contribution (\$2000 for primary, \$2000 for general) from Edward Mahlum on 5/9/16, and depositing it on the same day (see Report Nos. [100694425](#) and [100695070](#)). Ms. Franz later reported (on 7/27/16) that Mr. Mahlum made a contribution of only \$2000 (see Report No. [100711871](#)). Ms. Franz should have made the correction no later than 6/10/16 (when the C3 reports for May 2016 were due). Instead, she hid this donation from the public for **47 days past the statutory deadline.**
- Ms. Franz reported receiving a \$2500 contribution (\$2000 for primary, \$500 for general) from Dan Nordstrom on 5/9/16, and depositing it on the same day (see PDC Report Nos. [100694425](#) and [100695070](#)). Ms. Franz later reported (on 7/27/16) that Dan Nordstrom contributed \$2000 and Amy Nordstrom contributed \$500 (see Report No. [100711871](#)). Ms. Franz should have made reported these donations accurately on 6/10/16 (when the C3 reports for May 2016 were due). Instead, she hid this donation from the public for **47 days past the statutory deadline.**
- Ms. Franz reported receiving a \$100 contribution from Catherine Connolly on 5/27/16, and depositing it on 5/30/16 (see Report No. [100710262](#)). Ms. Franz should have reported this contribution no later than 6/10/16 (when the C3 reports for the month of

May 2016 were due)(see Report No. [100700520](#)). Instead, she reported this contribution on 7/25/16, **45 days past the statutory deadline.**

- Ms. Franz reported receiving a \$500 contribution from Jeff Clapsaddle on 6/27/16, and depositing it on 7/4/16 (see Report No. [100709541](#)). Ms. Franz should have reported this contribution no later than 7/11/16 (when the C3 reports for the week of 7/4/16 – 7/10/16 were due)(see Report No. [100706550](#)). Instead, she reported this contribution **8 days past the statutory deadline..**
- Ms. Franz reported receiving a \$1500 contribution (\$1000 for primary, \$500 for general) from John Schoettler on 6/27/16, and depositing it on 7/4/16 (see Report No. [100706550](#)). Ms. Franz later reported (on 7/19/16) that Mr. Schoettler contributed only \$1000 (see Report No. [100709541](#)). Ms. Franz should have disclosed this contribution no later than 7/11/16 (when the C3 reports for the week of 7/4/16 – 7/10/16 were due). Instead, she disclosed this contribution **8 days past the statutory deadline.**
- Ms. Franz reported receiving a \$1500 contribution from Dan Nordstrom on 6/29/16, and depositing it on 7/4/16 (see Report No. [100706550](#)). Ms. Franz later reported (on 7/28/16) that Mr. Nordstrom donated \$100, and Amy Nordstrom donated \$1400 (see Report No. [100712098](#)). Ms. Franz should have disclosed this contribution no later than 7/11/16 (when the C3 reports for the week of 7/4/16 – 7/10/16 were due). Instead, she disclosed this contribution **17 days past the statutory deadline.**
- Ms. Franz reported receiving a \$500 contribution from Jeff Clapsaddle on 7/11/16, and depositing it on the same day (see Report No. [100709545](#)). Ms. Franz should have reported this contribution no later than 7/18/16 (when the C3 reports for the week of 7/11/16 – 7/17/16 were due)(see Report No. [100707887](#)). Instead, she reported this contribution 1 day late (on 7/19/16).
- Ms. Franz reported receiving a \$500 contribution from John Schoettler on 7/11/16, and depositing it on the same day (see Report No. [100707887](#)). Ms. Franz later reported (on 7/19/16) that she did not receive this \$500 contribution from Mr. Schoettler (see Report No. [100709545](#)). Ms. Franz should have made this disclosure no later than 7/18/16 (when the C3 reports for the week of 7/11/16 – 7/17/16 were due). Instead, she disclosed this contribution 1 day - **well past the statutory deadline.**
- Ms. Franz reported receiving a \$500 contribution from Jeffrey Gow on 8/5/16, and depositing it on the same day (see Report No. [100714575](#)). Ms. Franz later reported (on 8/19/16) that she did not receive or deposit these funds (see Report No. [100716252](#)). Ms. Franz should have disclosed this fact no later than 8/8/16 (when the C3 reports for the week of 8/1/16 – 8/7/16 were due). Instead, she disclosed this to the public **11 days past the statutory deadline.**
- Ms. Franz reported receiving a \$500 contribution from Gary Young on 8/5/16, and depositing it on the same day (see Report No. [100714575](#)). Ms. Franz later reported (on 8/19/16) that she did not receive or deposit these funds (see Report No. [100716252](#)). Ms. Franz should have disclosed this fact no later than 8/8/16 (when the C3 reports for the week of 8/1/16 – 8/7/16 were due). Instead, she disclosed this fact to the public **11 days past the statutory deadline.**
- Ms. Franz made a \$200 expenditure on 10/4/16 to Kristina Brown for “Snohomish Dems – ticket for event” (see Report No. [100729622](#)). Ms. Franz should have reported this no later than 10/18/16 (when the C4 reports for 9/1/16 – 10/18/16 were due)(see

Report No. [100728209](#)). Instead, she reported this on 10/24/16, **6 days past the statutory deadline.**

- Ms. Franz made a \$170.35 expenditure on 10/6/16 to Kristina Brown for “Red Lion Hotel – lodging” (see Report No. [100729622](#)). Ms. Franz should have reported this no later than 10/18/16 (when the C4 reports for 9/1/16 – 10/18/16 were due)(see Report No. [100728209](#)). Instead, she reported this on 10/24/16, **6 days past the statutory deadline.**
- Ms. Franz received a \$1518.58 in-kind donation from Brooks Running Company on 10/12/16 for “The Guckenheimer – food for event” (see Report No. [100728963](#)). Ms. Franz should have reported this no later than 10/18/16 (when the C4 reports for 9/1/16 – 10/17/16 were due)(see Report No. [100728209](#)). Instead, she reported this on 10/20/16, 2 days late. **Well past the statutory deadline.**
- Ms. Franz received a \$287 in-kind donation from Sierra Club PAC Washington on 10/27/16 for “robocalls” (see Report No. [100734805](#)). Ms. Franz should have reported this no later than 11/1/16 (when the C4 reports for 10/18/16 – 10/31/16 were due)(see Report No. [100732874](#)). Instead, she reported this on 11/8/16, **7 days past the statutory deadline.**
- Ms. Franz reported that she paid \$900 to William L. Donnelly on 10/31/16 for “NARAL – tab at the Cloud Room” (see Report Nos. [100732874](#), [100734805](#) and [100736249](#)). Ms. Franz later reported that she did not pay Mr. Donnelly \$900 on 10/31/16 (see Report No. [100736552](#)). Ms. Franz should have disclosed the truth no later than 11/1/16 (when the C4 reports for 10/18/16 – 10/31/16 were due). Instead, she made the belatedly disclosed these facts on 12/5/16, **34 days past the statutory deadline.**

### **(3) Failure to timely and accurately report debt (Violation of RCW 42.17A.240).**

RCW [42.17A.240](#)(8) requires a candidate to disclose 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.” Ms. Franz violated this law in the following instances:

- Ms. Franz made a \$328.80 debt obligation on 7/12/16 to Ann Norton Photography for “campaign photos” (see Report No. [100717400](#)). Ms. Franz should have reported this no later than 7/26/16 (when the C4 reports for 7/12/16 – 7/25/16 were due)(see Report No. [100711546](#)). Instead, she reported this on 8/29/16, **34 days past the statutory deadline.**
- Ms. Franz made a \$1424.80 debt obligation on 8/18/16 to Boruck Printing & Silkscreen for “yard signs” (see Report No. [100728065](#)). Ms. Franz should have reported this no later than 9/12/16 (when the C4 reports for 7/26/16 – 8/31/16 were due)(see Report No. [100720347](#)). Instead, she reported this on 10/18/16, **36 days past the statutory deadline.**
- Ms. Franz made a \$688.40 debt obligation on 10/7/16 to Kristina Brown for “Alaska Air – airfare” (see Report No. [100729622](#)). Ms. Franz should have reported this no later than 10/18/16 (when the C4 reports for 9/1/16 – 10/18/16 were due)(see Report No.

[100728209](#)). Instead, she reported this on 10/24/16, **6 days past the statutory deadline.**

- Ms. Franz made a \$1624.20 debt obligation on 10/17/16 to McComb Sound for “ad editing/production” (see Report No. [100728963](#)). Ms. Franz should have reported this no later than 10/18/16 (when the C4 reports for 9/1/16 – 10/18/16 were due)(see Report No. [100728209](#)). Instead, she reported this on 10/20/16, 2 days late. **Well past the statutory deadline.**
- Ms. Franz made a \$682.50 debt obligation on 10/31/16 to Schwerin Campbell Barnard Iglitzin for “legal services for PDC complaint” (see Report No. [100736249](#)). Ms. Franz should have reported this no later than 11/1/16 (when the C4 reports for 10/18/16 – 10/31/16 were due)(see Report No. [100732874](#)). Instead, she reported this on 12/2/16, **31 days past the statutory deadline.**
- Ms. Franz made a \$296 debt obligation on 11/30/16 to Schwerin Campbell Barnard Iglitzin for “legal services for PDC complaint” (see Report No. [100738978](#)). Ms. Franz should have reported this no later than 12/12/16 (when the C4 reports for 11/1/16 – 11/30/16 were due)(see Report No. [100737496](#)). Instead, she reported this on 12/22/16, **10 days past the statutory deadline.**
- In Report No. [100740980](#), Ms. Franz paid \$3258 to Kristina Brown on 12/16/16 for "bonus." Bonuses are agreed upon and stipulated in service contracts. Ms. Franz should have reported this \$3258 bonus as a debt obligation at the time she signed a contract with Ms. Brown (in August 2016) for her services. **The only way to verify whether Ms. Franz violated the law or was in compliance is to obtain and review a copy of her contract with Ms. Brown, which appears to be the next prudent step to take in any investigation on this issue. This bonus is highly unusual.**

**(4) Failure to describe goods and/or services in detail (Violation of RCW 42.17A.235 & .240)** Ms. Franz made numerous violations of RCW [42.17A.235](#) and [42.17A.240](#)(6) (which requires a candidate to disclose “the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure”), and WAC [390-16-037](#)(3) (which requires a candidate to "describe in detail the goods and/or services to be provided by the recipient of the expenditure"). WAC 390-16-037 also provides three examples of the detail required (Examples A, B and C below).

"Example A: If an expenditure is for a get-out-the-vote campaign, the purpose shall include the following details:

<b>Vendor Name</b>	<b>Purpose</b>	<b>Amount</b>
XYZ Consulting	GOTV—phone bank 28th and 29th Legislative districts	\$1,000

Example B: If an expenditure is for printing, the purpose shall include the following details:

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Vendor Name	Purpose	Amount
ABC Printing	5,000 brochures	\$3,000

Example C: If an expenditure is for broadcast political advertisements, the purpose shall include the following details:

Vendor Name	Purpose	Amount
Media King	Television ads	\$50,000
	WZUB TV	\$30,000
	WXXX TV	\$10,000
	WCRB TV	\$10,000

4/20/16 to 4/30/16

- In Report No. [100694415](#), Ms. Franz made a debt obligation of \$212.25 to Abbot Taylor on 4/30/16 for "treasury service." Ms. Franz **failed to disclose the dates the services were provided.**

5/1/16 to 5/31/16

- In Report No. [100700521](#), Ms. Franz paid \$212.25 to Abbot Taylor on 5/6/16 for "treasury services." Ms. Franz **failed to disclose the dates the services were provided.**
  - In Report No. [100700521](#), Ms. Franz paid \$706 to NWP Consulting on 5/23/16 for "overnight printing – remits." Ms. Franz **failed to disclose the quantity of remits.**
- In Report No. [100700521](#), Ms. Franz paid \$1920.65 to Kristin Elia on 5/31/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100700521](#), Ms. Franz made a \$1302.53 in-kind contribution on 5/16/16 for "Secretary of State – filing fee." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Washington State Secretary of State).
- In Report No. [100700521](#), Ms. Franz made a \$500.40 debt obligation to NWP Consulting for "overnight printing – flyers/stickers." Ms. Franz **failed to disclose the quantity of flyers and stickers.**
- In Report No. [100700521](#), Ms. Franz made a \$505.50 debt obligation to Abbot Taylor for "treasury services." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100700521](#), Ms. Franz made a \$3000 debt obligation to Katherine Bobman Consulting for "fundraising." Ms. Franz **failed to disclose the dates the services were provided.**

6/1/16 to 7/11/16

- In Report No. [100707893](#), Ms. Franz paid \$53.74 to Kristin Elia on 6/1/16 for "Brown Paper Tickets – event tickets." Ms. Franz **failed to disclose the quantity of tickets and the address of the actual vendor** (i.e., Brown Paper Tickets).
- In Report No. [100707893](#), Ms. Franz paid \$500.40 to NWP Consulting on 6/1/16 for "overnight printing – flyers/stickers." Ms. Franz **failed to disclose the quantity of flyers and stickers.**
- In Report No. [100707893](#), Ms. Franz paid \$505.50 to Abbot Taylor on 6/2/16 for "treasury services." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100707893](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 6/3/16 for "fundraising." Ms. Franz **failed to disclose the dates the services were provided.**
  - In Report No. [100707893](#), Ms. Franz paid \$100 to Katherine Bobman Consulting on 6/3/16 for "KaylorMade – invite design." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
  - In Report No. [100707893](#), Ms. Franz paid \$303.75 to NWP Consulting on 6/13/16 for "overnight printing – one pagers/stickers." Ms. Franz **failed to disclose the quantity of pages and stickers, as well as the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$1920.65 to Kristin Elia on 6/15/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
  - In Report No. [100707893](#), Ms. Franz paid \$450.60 to NWP Consulting on 6/15/16 for "overnight printing – one pagers." Ms. Franz **failed to disclose the quantity of pages, as well as the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$5000 to NWP Consulting on 6/23/16 for "campaign consulting." Ms. Franz **failed to disclose the dates the services were provided.**
  - In Report No. [100707893](#), Ms. Franz paid \$303.45 to NWP Consulting on 6/23/16 for "overnight printing – one pagers." Ms. Franz **failed to disclose the quantity of pages, as well as the name and address of the actual printing vendor.**
  - In Report No. [100707893](#), Ms. Franz paid \$472.20 to herself on 6/27/16 for "Alaska Air – airfare." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Alaska Air).
- In Report No. [100707893](#), Ms. Franz paid \$1920.65 to Kristin Elia on 6/30/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100707893](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 7/8/16 for "fundraising." Ms. Franz **failed to disclose the dates the services were provided.**
  - In Report No. [100707893](#), Ms. Franz paid \$150 to Katherine Bobman Consulting on 7/8/16 for "KaylorMade – invite design." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
  - In Report No. [100707893](#), Ms. Franz paid \$104.49 to Katherine Bobman Consulting on 7/8/16 for "Event Helper – insurance for event." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Event Helper).

- In Report No. [100707893](#), Ms. Franz paid \$736.76 to Katherine Bobman Consulting on 7/8/16 for “Tutta Bella – food for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Tutta Bella).
- In Report No. [100707893](#), Ms. Franz paid \$308.06 to Katherine Bobman Consulting on 7/8/16 for “Met Market/Whole Foods/Safeway – food for events.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Metropolitan Market, Whole Foods, and Safeway).
- In Report No. [100707893](#), Ms. Franz paid \$758.70 to Abbot Taylor on 7/8/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100707893](#), Ms. Franz paid \$254.29 to Kristin Elia on 7/11/16 for “mileage/toll reimbursement.” Ms. Franz **failed to disclose the address of the actual toll vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$97.45 to Kristin Elia on 7/11/16 for “Facebook – online ads.” Ms. Franz **failed to disclose the dates the ads appeared, and the address of the actual vendor** (i.e., Facebook).
- In Report No. [100707893](#), Ms. Franz paid \$64.29 to Kristin Elia on 7/11/16 for “City Club of Tacoma – tickets to event.” Ms. Franz **failed to disclose the quantity of tickets and the address of the actual vendor** (i.e., City Club of Tacoma).
- In Report No. [100707893](#), Ms. Franz paid \$1364.40 to NWP Consulting on 7/11/16 for “overnight printing – stationery.” Ms. Franz **failed to disclose the quantity of stationary, and the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$1364.40 to NWP Consulting on 7/11/16 for “overnight printing – stationery.” Ms. Franz **failed to disclose the quantity of stationary, and the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$1031 to NWP Consulting on 7/11/16 for “overnight printing – two pagers/business cards.” Ms. Franz **failed to disclose the quantity of two pagers and business cards, as well as the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$144.16 to NWP Consulting on 7/11/16 for “overnight printing – signs.” Ms. Franz **failed to disclose the quantity of signs, as well as the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$90.27 to NWP Consulting on 7/11/16 for “overnight printing – stickers.” Ms. Franz **failed to disclose the quantity of stickers, as well as the name and address of the actual printing vendor.**
- In Report No. [100707893](#), Ms. Franz paid \$577.55 to NWP Consulting on 7/11/16 for “Cap City Press – banners.” Ms. Franz **failed to disclose the quantity of banners, as well as the address of the actual vendor** (i.e., Capital City Press).
- In Report No. [100707893](#), Ms. Franz made a \$5000 debt obligation to NWP Consulting on 7/1/16 for “campaign consulting.” Ms. Franz **failed to disclose the dates the services were provided.**

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7/12/16 to 7/25/16

- In Report No. [100717400](#), Ms. Franz paid \$1920.65 to Kristin Elia on 7/15/16 for “campaign management.” Ms. Franz **failed to disclose the time-period for which the services were provided.**

- In Report No. [100717400](#), Ms. Franz paid \$1820 to NGP Van, Inc. on 7/18/16 for “data services.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100717400](#), Ms. Franz paid \$1424.80 to Boruck Printing on 7/21/16 for “yard signs.” Ms. Franz **failed to disclose the quantity of yard signs.**
- In Report No. [100717400](#), Ms. Franz paid \$250.21 to Kristin Elia on 7/25/16 for “Facebook – online ads.” Ms. Franz **failed to disclose the dates the ads appeared and the address of the actual vendor** (i.e., Facebook).
- In Report No. [100717400](#), Ms. Franz paid \$61.52 to Kristin Elia on 7/25/16 for “Whatcom Co Dems/Jefferson Co Dems – event tickets.” Ms. Franz **failed to disclose the quantity tickets and the address of the actual vendors** (i.e., Whatcom County Democrats, and Jefferson County Democrats).
- In Report No. [100717400](#), Ms. Franz paid \$171.55 to NWP Consulting on 7/25/16 for “overnight printing – signs/stickers.” Ms. Franz **failed to disclose the quantity of signs and stickers, and the name and address of the actual printing vendor.**
- In Report No. [100717400](#), Ms. Franz made a debt obligation of \$5000 to NWP Consulting on 7/1/16 for “campaign consulting.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100717400](#), Ms. Franz made a debt obligation of \$328.80 to Ann Norton Photography on 7/12/16 for “campaign photos.” Ms. Franz **failed to disclose the quantity of photos.**

7/26/16 to 8/31/16

- In Report No. [100728065](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 7/29/16 for “fundraising.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$250 to Katherine Bobman Consulting on 7/29/16 for “KaylorMade – invite design.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
- In Report No. [100728065](#), Ms. Franz paid \$94 to Katherine Bobman Consulting on 7/29/16 for “USPS – postage.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., USPS).
- In Report No. [100728065](#), Ms. Franz paid \$170.64 to Katherine Bobman Consulting on 7/29/16 for “Safeway – food for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Safeway).
- In Report No. [100728065](#), Ms. Franz paid \$210.96 to Katherine Bobman Consulting on 7/29/16 for “Safeway/Met Market – food for event.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Safeway and Metropolitan Market).
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 7/31/16 for “campaign management.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$515.78 to Kristin Elia on 8/1/16 for “Facebook/Instagram – online ads.” Ms. Franz **failed to disclose dates the ads appeared, as well as the addresses of the actual vendors** (i.e., Facebook and Instagram).

- In Report No. [100728065](#), Ms. Franz paid \$126 to NWP Consulting on 8/1/16 for “overnight printing – business cards.” Ms. Franz **failed to disclose the quantity of business cards, as well as the name and address of the actual printing vendor.**
- In Report No. [100728065](#), Ms. Franz paid \$1162.50 to Abbot Taylor on 8/1/16 for “treasury services.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$1450 to NWP Consulting on 8/2/16 for “Google/Facebook – online ads.” Ms. Franz **failed to disclose the dates the ads appeared, as well as the addresses of the actual vendors** (i.e., Google and Facebook).
- In Report No. [100728065](#), Ms. Franz paid \$364.69 to herself on 8/11/16 for “Via Tribunali – food for election night party.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Via Tribunali).
- In Report No. [100728065](#), Ms. Franz paid \$5000 to NWP Consulting on 8/11/16 for “campaign consulting.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 8/15/16 for “campaign management.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$284.01 to Kristin Elia on 8/25/16 for “Facebook/Instagram – online ads.” Ms. Franz **failed to disclose dates the ads appeared, as well as the addresses of the actual vendors** (i.e., Facebook and Instagram).
- In Report No. [100728065](#), Ms. Franz paid \$328.80 to Ann Norton Photography on 8/29/16 for “campaign photos.” Ms. Franz **failed to disclose the quantity of photos.**
- In Report No. [100728065](#), Ms. Franz paid \$1623.90 to Kristina Brown on 8/31/16 for “campaign management.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 8/31/16 for “campaign management.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz received a \$325 in-kind contribution from Cody Arledge on 8/31/16 for “Lisa Mikesell – research.” Ms. Franz **failed to disclose the purpose of the research, as well as the address of the actual vendor** (i.e., Lisa Mikesell).
- In Report No. [100728065](#), Ms. Franz made a debt obligation of \$455.25 to Abbot Taylor on 8/31/16 for “treasury services.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz made a debt obligation of \$3000 to Katherine Bobman Consulting on 8/31/16 for “fundraising.” Ms. Franz **failed to disclose the time-period for which the services were provided.**
- In Report No. [100728065](#), Ms. Franz made a debt obligation of \$225 to Katherine Bobman Consulting on 8/31/16 for “KaylorMade – invite design.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).

- In Report No. [100728065](#), Ms. Franz made a debt obligation of \$94 to Katherine Bobman Consulting on 8/31/16 for “USPS – postage.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., USPS).
- In Report No. [100728065](#), Ms. Franz made a debt obligation of \$1424.80 to Boruck Printing & Silkscreen on 8/18/16 for “yard signs.” Ms. Franz **failed to disclose the quantity of yard signs.**

9/1/16 to 10/17/16

- In Report No. [100729622](#), Ms. Franz paid \$455.25 to Abbot Taylor on 9/5/16 for "treasury services." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$94 to Katherine Bobman Consulting on 9/7/16 for "USPS - postage." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., USPS).
- In Report No. [100729622](#), Ms. Franz paid \$225 to Katherine Bobman Consulting on 9/7/16 for "KaylorMade – invite design." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
- In Report No. [100729622](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 9/7/16 for "fundraising." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$60.30 to William L. Donnelly on 9/9/16 for "WSF – ferry for event." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., WSF).
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 9/15/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$441.15 to NWP Consulting on 9/22/16 for “overnight printing – stickers.” Ms. Franz **failed to disclose the quantity of stickers, as well as the name and address of the actual printing vendor.**
- In Report No. [100729622](#), Ms. Franz paid \$539 to NWP Consulting on 9/22/16 for “overnight printing – remits.” Ms. Franz **failed to disclose the quantity of remits, as well as the name and address of the actual printing vendor.**
- In Report No. [100729622](#), Ms. Franz paid \$246.61 to Thompson Sign Shop on 9/22/16 for “T-shirts.” Ms. Franz **failed to disclose the quantity of T-shirts.**
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 9/30/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 10/7/16 for "fundraising." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$275 to Katherine Bobman Consulting on 10/7/16 for "KaylorMade – invite design." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
- In Report No. [100729622](#), Ms. Franz paid \$448.60 to Katherine Bobman Consulting on 10/7/16 for "Basil Café/Goose Grocery/Eat Good – event food." Ms. Franz **failed to**

**disclose the addresses of the actual vendors** (i.e., Basil Café, Goose Grocery, and Eat Good).

- In Report No. [100729622](#), Ms. Franz paid \$65.90 to Katherine Bobman Consulting on 10/7/16 for "Cash & Carry – event supplies." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Cash & Carry).
- In Report No. [100729622](#), Ms. Franz paid \$581.25 to Abbot Taylor on 10/7/16 for "treasury services." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz paid \$288.10 to NWP Consulting on 10/10/16 for "overnight printing – doorbellers." Ms. Franz **failed to disclose the quantity of doorbellers, as well as the name and address of the actual printing vendor.**
- In Report No. [100729622](#), Ms. Franz paid \$607.20 to NWP Consulting on 10/10/16 for "Senior Focus – print ads." Ms. Franz **failed to disclose the dates the ads appeared.**
- In Report No. [100729622](#), Ms. Franz paid \$463.20 to NWP Consulting on 10/10/16 for "Google – online ads." Ms. Franz **failed to disclose the dates the ads appeared.**
- In Report No. [100729622](#), Ms. Franz paid \$72.13 to Katherine Bobman Consulting on 10/13/16 for "Met Market – food for event." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Metropolitan Market).
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 10/15/16 for "campaign management." Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100729622](#), Ms. Franz received a \$411.32 in-kind contribution from Lynn Bahrych on 9/6/16 for "Orcas Island Hotel – food & drinks for event." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Orcas Island Hotel).
- In Report No. [100729622](#), Ms. Franz received a \$50 in-kind contribution from Cody Arledge on 9/15/16 for "Chris Tufts – fuel reimbursement." Ms. Franz **failed to disclose the address of the actual fuel vendor.**
- In Report No. [100729622](#), Ms. Franz received a \$1000 in-kind contribution from NWP Consulting on 9/26/16 for "Normington, Ptt & Associates – poll." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Normington, Ptt & Associates).
- In Report No. [100729622](#), Ms. Franz received a \$191.75 in-kind contribution from Nancy Ritzenhaler on 9/26/16 for "Costco/Safeway Market – food & drinks for event." Ms. Franz **failed to disclose the address of the actual vendors** (i.e., Costco and Safeway).
- In Report No. [100729622](#), Ms. Franz received a \$1518.58 in-kind contribution from Brooks Running Company on 10/12/16 for "The Guckenheimer – food for event." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., The Guckenheimer).
- In Report No. [100729622](#), Ms. Franz made a \$1218.70 debt obligation to Katherine Bobman Consulting on 10/17/16 for "Smith Tower – event space rental & catering." Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Smith Tower).
- In Report No. [100729622](#), Ms. Franz made a \$1424.80 debt obligation to Boruck Printing & Silkscreen on 8/18/16 for "yard signs." Ms. Franz **failed to disclose the quantity of yard signs.**
- In Report No. [100729622](#), Ms. Franz made a \$1108.36 debt obligation to NWP Consulting on 10/17/16 for "overnight printing – stationery." Ms. Franz **failed to**

**disclose the quantity of stationary, as well as the name and address of the actual printing vendor.**

- In Report No. [100729622](#), Ms. Franz made a \$200 debt obligation to Kristina Brown on 10/4/16 for “Snohomish Dems – ticket for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Snohomish County Democrats).
- In Report No. [100729622](#), Ms. Franz made a \$170.35 debt obligation to Kristina Brown on 10/6/16 for “Red Lion Hotel – lodging.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Red Lion Hotel).
- In Report No. [100729622](#), Ms. Franz made a \$688.40 debt obligation to Kristina Brown on 10/7/16 for “Alaska Air – airfare.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Alaska Air).

10/18/16 to 10/31/16

- In Report No. [100736552](#), Ms. Franz paid \$1424.80 to Boruck Printing on 10/19/16 for “yard signs.” Ms. Franz **failed to disclose the quantity of yard signs.**
- In Report No. [100736552](#), Ms. Franz paid \$1108.36 to NWP Consulting on 10/20/16 for “overnight printing – stationery.” Ms. Franz **failed to disclose the quantity of printing, as well as the name and address of the actual printing vendor.**
- In Report No. [100736552](#), Ms. Franz paid \$200 to Kristina Brown on 10/24/16 for “Snohomish Dems – tickets for event.” Ms. Franz **failed to disclose the quantity of tickets, as well as the address of the actual vendor** (i.e., Snohomish County Democrats).
- In Report No. [100736552](#), Ms. Franz paid \$170.35 to Kristina Brown on 10/24/16 for “Red Lion Hotel – lodging.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Red Lion Hotel).
- In Report No. [100736552](#), Ms. Franz paid \$688.40 to Kristina Brown on 10/24/16 for “Alaska Air – airfare.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Alaska Air).
- In Report No. [100736552](#), Ms. Franz paid \$150 to Kristina Brown on 10/24/16 for “WCV – tickets for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., WCV).
- In Report No. [100736552](#), Ms. Franz paid \$300 to Kristina Brown on 10/24/16 for “Seattle Audubon – tickets for event.” Ms. Franz **failed to disclose the quantity of tickets, as well as the address of the actual vendor** (i.e., Seattle Audubon).
- In Report No. [100736552](#), Ms. Franz paid \$123.93 to Kristina Brown on 10/28/16 for “Restaurant Marche/Pacific Grill – food for events.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Restaurant Marche and Pacific Grill).
- In Report No. [100736552](#), Ms. Franz paid \$66.93 to Kristina Brown on 10/28/16 for “Chevron/Walmart – gas.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Chevron and Walmart).
- In Report No. [100736552](#), Ms. Franz paid \$148.34 to Kristina Brown on 10/28/16 for “Holiday Inn – lodging.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Holiday Inn).
- In Report No. [100736552](#), Ms. Franz paid \$1623.90 to Kristina Brown on 10/31/16 for “campaign management.” Ms. Franz **failed to disclose the dates the services were provided.**

- In Report No. [100736552](#), Ms. Franz received a \$287 in-kind contribution from Sierra Club PAC Washington on 10/27/16 for “robocalls.” Ms. Franz **failed to disclose the purpose of the robocalls.**
- In Report No. [100736552](#), Ms. Franz made a \$1218.70 debt obligation to Katherine Bobman Consulting 10/17/16 for “Smith Tower – event space rental & catering.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Smith Tower).
- In Report No. [100736552](#), Ms. Franz made a \$306.84 debt obligation to Katherine Bobman Consulting 10/19/16 for “Whole Foods – food for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Whole Foods).
- In Report No. [100736552](#), Ms. Franz made a \$1557 debt obligation to Abbot Taylor 10/31/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100736552](#), Ms. Franz made a \$100 debt obligation to Katherine Bobman Consulting 10/31/16 for “KaylorMade – invite design.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
- In Report No. [100736552](#), Ms. Franz made a \$3000 debt obligation to Katherine Bobman Consulting 10/31/16 for “fundraising.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100736552](#), Ms. Franz made a \$998.44 debt obligation to Katherine Bobman Consulting 10/31/16 for “Whole Foods/Town & Country/Finnriver – food for events.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Whole Foods, Town & Country, and Finnriver).

#### 11/1/16 to 11/30/16

- In Report No. [100738978](#), Ms. Franz paid \$1218.70 to Katherine Bobman Consulting on 11/11/16 for “Smith Tower – event space rental & catering.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Smith Tower).
- In Report No. [100738978](#), Ms. Franz paid \$306.84 to Katherine Bobman Consulting on 11/11/16 for “Whole Foods – food for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Whole Foods).
- In Report No. [100738978](#), Ms. Franz paid \$998.44 to Katherine Bobman Consulting on 11/11/16 for “Whole Foods/Town & Country/Finnriver – event food.” Ms. Franz **failed to disclose the addresses of the actual vendors** (i.e., Whole Foods, Town & Country, and Finnriver).
- In Report No. [100738978](#), Ms. Franz paid \$100 to Katherine Bobman Consulting on 11/11/16 for “KaylorMade – invite design.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., KaylorMade).
- In Report No. [100738978](#), Ms. Franz paid \$3000 to Katherine Bobman Consulting on 11/11/16 for “fundraising.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100738978](#), Ms. Franz paid \$1557 to Abbot Taylor on 11/14/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100738978](#), Ms. Franz paid \$1623.90 to Kristina Brown on 11/15/16 for “campaign management.” Ms. Franz **failed to disclose the dates the services were provided.**

- In Report No. [100738978](#), Ms. Franz paid \$1623.90 to Kristina Brown on 11/30/16 for “campaign management.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100738978](#), Ms. Franz paid \$84.30 to William L. Donnelly on 11/30/16 for “WSF – ferry.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., WSF).
- In Report No. [100738978](#), Ms. Franz made a \$2100 in-kind contribution on 11/1/16 for “Kaspar’s Catering for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Kaspar’s Catering).
- In Report No. [100738978](#), Ms. Franz made a \$3750 debt obligation to Katherine Bobman Consulting on 11/17/16 for “fundraising.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100738978](#), Ms. Franz made a \$531 debt obligation to Abbot Taylor on 11/30/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**

12/1/16 to 12/31/16

- In Report No. [100740980](#), Ms. Franz paid \$531 to Abbot Taylor on 12/12/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100740980](#), Ms. Franz paid \$3750 to Katherine Bobman Consulting on 12/19/16 for “fundraising.” Ms. Franz **failed to disclose the dates the services were provided.**
- In Report No. [100740980](#), Ms. Franz paid \$862.20 to Katherine Bobman Consulting on 12/19/16 for “Wild Ginger – food for event.” Ms. Franz **failed to disclose the address of the actual vendor** (i.e., Wild Ginger).
- In Report No. [100740980](#), Ms. Franz made a \$455.25 debt obligation to Abbot Taylor on 12/31/16 for “treasury services.” Ms. Franz **failed to disclose the dates the services were provided.**

#### **(5) Failure to identify committee officers (Violation of RCW 42.17A.205(2)(c))**

**RCW 42.17A.205(2)(c)** requires a candidate to file a statement of organization that identifies “the names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders.”

Ms. Franz violated RCW 42.17A.205(2)(c) **four times** when she failed to identify committee officers/responsible leaders in her [C1 Report](#).

Ms. Franz paid a total of \$13,444.55 to Kristin Elia for “campaign management,” and a total of \$14,625.30 to Kristina Brown for “campaign management” and “bonus.” This indicates that Ms. Elia and Ms. Brown held positions of responsibility in Ms. Franz’s campaign, one in which Ms. Elia and Ms. Brown made leadership and expenditure decisions. Ms. Franz’s C4 reports also show that Ms. Elia and Ms. Brown made dozens of expenditures for which Ms. Franz later reimbursed them (e.g., event tickets,

gas/mileage, tolls, airline tickets, online ads). These reimbursed expenditures indicate monetary discretionary authority.

- In Report No. [100700521](#), Ms. Franz paid \$1920.65 to Kristin Elia on 5/31/16 for "campaign management."
- In Report No. [100707893](#), Ms. Franz paid \$1920.65 to Kristin Elia on 6/15/16 for "campaign management."
- In Report No. [100707893](#), Ms. Franz paid \$1920.65 to Kristin Elia on 6/30/16 for "campaign management."
- In Report No. [100717400](#), Ms. Franz paid \$1920.65 to Kristin Elia on 7/15/16 for "campaign management."
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 7/31/16 for "campaign management."
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 8/15/16 for "campaign management."
- In Report No. [100728065](#), Ms. Franz paid \$1920.65 to Kristin Elia on 8/31/16 for "campaign management."
- In Report No. [100728065](#), Ms. Franz paid \$1623.90 to Kristina Brown on 8/31/16 for "campaign management."
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 9/15/16 for "campaign management."
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 9/30/16 for "campaign management."
- In Report No. [100729622](#), Ms. Franz paid \$1623.90 to Kristina Brown on 10/15/16 for "campaign management."
- In Report No. [100736552](#), Ms. Franz paid \$1623.90 to Kristina Brown on 10/31/16 for "campaign management."
- In Report No. [100738978](#), Ms. Franz paid \$1623.90 to Kristina Brown on 11/15/16 for "campaign management."
- In Report No. [100738978](#), Ms. Franz paid \$1623.90 to Kristina Brown on 11/30/16 for "campaign management."
- In Report No. [100740980](#), Ms. Franz paid \$3258 to Kristina Brown on 12/16/16 for "bonus."

Other officers that Ms. Franz failed to disclose are [Northwest Passage Consulting](#) (a.k.a., NWP Consulting) and [Katherine Bobman](#) (of Katherine Bobman Consulting). Ms. Franz's C4 reports show dozens of expenditures made by NWP Consulting and Katherine Bobman Consulting for which Ms. Franz later reimbursed them (e.g., print material, design, ad buys, food for events, event insurance, postage, event locations, etc.). **These reimbursed expenditures indicate monetary discretionary authority.**

**To verify the complete extent and pervasiveness of these violations, it is likely the PDC or AG will need to obtain and review a copy of Franz's contracts with Ms. Elia, Ms. Brown, Katherine Bobman Consulting, and Northwest Passage Consulting.**

**(6) Failure to disclose Board Positions on Financial Affairs Statement (Violation of RCW 42.17A.710(g))**

**RCW 42.17a.710(g)** clearly requires office-holders to disclose the name of any corporation, partnership, joint venture, association, union, or **other entity**,” including any “governmental unit,” on a candidate’s Financial Affairs Form. Unfortunately, Franz appears to have decided not to do so. For example, Hillary Franz failed to disclose that she is a member of the [Puget Sound Partnership Salmon Recovery Council](#), and the [Puget Sound Partnership Ecosystem Coordination Board](#) on her 2017 Financial Affairs (F1) form.

**(7) Hillary Franz has illegally donated to a variety of political committees during her campaign (Violation of RCW 42.17A.430(8))**

Specifically Franz donated funds to the Whatcom County Democrats, Jefferson County Democrats, and the Snohomish County Democrats from her candidate committee. See the specific reports detailing these illegal donations below. While Franz is allowed to pay market value for objects of real value (like newsletter advertising space, or a booth, etc.) to candidate/political committees, she is prohibited from transferring funds to them in excess of that amount. These donations are a violation of **RCW 42.17A.430 (8)**.

- In Report No. [100717400](#), Ms. Franz paid \$61.52 to Kristin Elia on 7/25/16 for "Whatcom Co Dems/Jefferson Co Dems – event tickets."
- In Report No. [100729622](#), Ms. Franz made a \$200 debt obligation to Kristina Brown on 10/4/16 for "Snohomish Dems – ticket for event."

For more information on this specific violation, please see **Thurston County Superior Court Case #16-2-04960-34** filed by the Washington State Attorney General against Jim Cooper, a candidate for the Thurston County Commission for this very same violation.

The PDC should investigate the possibility that Hillary Franz 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