

Complaint #5

Friends of Manka (Manka Dhingra for State Senate)

Introduction

To Whom It May Concern –

It has come to my attention that Manka Dhingra has committed additional violations of **RCW 42.17A** in her 2017 campaign for State Senate.

In her last response to the PDC, Dhingra exhibited a heightened defensiveness that indicates an unwillingness to obey the most basic provisions of Washington State’s campaign finance disclosure rules. It is also disturbing that Dhingra and her campaign continue to misinterpret the application of **RCW 42.17A** and **WAC 390**.

All candidates who run for public office in Washington State are required to abide by the provisions of the Campaign Disclosure and Contribution Act. This fact should be abundantly clear to the Dhingra campaign, however her campaign continues to commit multiple violations on a repeat basis.

In her previous response, Dhingra accused me of creating a “fake email address”. This is false. I work with a variety of individuals and whistleblowers from around the state to uncover violations of campaign finance law, and the documentation I used in the last complaint was sent to me by a variety of whistleblowers who may have volunteered to help Dhingra. I am following the statute which allows citizens to file complaints as they uncover the unlawful behavior of Dhingra’s campaign as a service to everyone who cares about transparency in our political campaigns.

Conversely, the illegal behavior of Dhingra and her campaign is escalating at an alarming rate. Most recently, a member of Dhingra’s campaign team secretly recorded the political meeting of the 45th LD Republicans. (See **PDC Complaint #18732** filed by Alex Bond).

As a career prosecutor, Dhingra knows better than to have her campaign team illegally record the meetings and conversations of her political opposition. Dhingra is well aware that secretly recording this meeting and conversations may be a violation of state recording consent laws. For her to allow her campaign team to stoop to this level is unconscionable and creates great concern to me about the safety and welfare of the 45th District constituents who are trying to engage in political discourse.

There are also concerns about where this escalation will lead. I urge the PDC and the Attorney General’s Office to investigate Dhingra and Bond’s behavior—which is, at best, intimidating and threatening, and, at worst, completely unlawful. Dhingra should immediately instruct her staff to stop all current or future illegal activities and focus on a positive campaign.

Violations

1) State law prohibits a person from providing a false document to be filed with the PDC and makes that violation a class C felony. RCW 42.17A.750(2)(c). State law also requires that all political advertisement contain sponsor identification, which includes the sponsor's name and address. RCW 42.17A.320. Mediums defined as political advertisement that are required to contain sponsor ID include Facebook pages and advertisements. WAC 390-05-290. State law also requires that both the treasurer and the candidate must certify all contribution and expenditure reports as correct and accurate. RCW 42.17A.235 (7). State law also requires that candidate committees identify any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic, or policy decisions on behalf of the committee as officers on their C-1 form. RCW 42.17A.205, WAC 390-05-245. State law further requires that accurate names, addresses, and titles of its officers be included on the committee's C-1. RCW 42.17A.205(2)(c). Additionally, State law prohibits expenditures from being made or incurred by any candidate committee unless authorized by the person or persons named on the committee's C-1 registration form. RCW 42.17A.425.

Dhingra's response to the latest PDC complaint submitted against her (see **PDC Case #18600**) contains information which has revealed numerous new violations.

Specifically, in her 6/7/2017 response to the PDC, Dhingra alleged that she personally certifies every report filed by her campaign treasurer and that she also makes all spending decisions for the campaign. If this were actually the case (which it is not), then Dhingra would have been aware that her campaign actually has purchased Facebook advertisements, in direct contradiction to her statement given to the PDC. Indeed, if we were to accept her version of the truth, she would have personally been the one who authorized this expenditure.

Here was Dhingra's statement:

*My campaign does not pay Facebook to have a Facebook Page. The service is free, and thus is not "paid for" by the campaign. However, even though the PDC does not require it, given the persistent, incessant, baseless behavior of Mr. Morgan my campaign has now amended the absolutely free Facebook page to show that it is "paid for" by my campaign. **The campaign has not bought any Facebook advertisements. Again, I have no idea what the basis of Mr. Morgan's complaint is.** (Emphasis added)*

Here are the expenditures made by Dhingra's campaign that directly contradict that statement:

REPO...	NAME	DATE	AMOUNT	CITY	STATE	ZIP	DESCRIPTION
Report	NORTHWEST PASSAGE CONSULTING	4/3/2017	\$60.00	SEATTLE	WA	98104	NORTHWEST PASSAGE CONSULTING,FACEBOOK - MENLO PARK, CA - ADVERTISEMENT
Report	NORTHWEST PASSAGE CONSULTING	4/3/2017	\$60.00	SEATTLE	WA	98104	NORTHWEST PASSAGE CONSULTING,FACEBOOK - MENLO PARK, CA - ADVERTISEMENT
Report	NORTHWEST PASSAGE CONSULTING	4/25/2017	\$57.50	SEATTLE	WA	98104	FACEBOOK - MENLO PARK, CA - ADVERTISEMENT

Displaying items 1 - 3 of 3

In addition to confirming the fact that her Facebook advertisements did not bear proper sponsor identification (a violation of state law), three facts are clear from Dhingra's statement.

First, the fact that she did not know that her campaign had purchased Facebook advertisements, and thus must not have authorized it as the committee's sole officer – **a violation of state law.**

Second, that Northwest Passage Consulting (run by Christian Sinderman) **did** make the expenditure, and was reimbursed for it, yet was not listed as an officer on Dhingra's C1 form – **another violation of state law.**

Third, we can see that she must not have not personally reviewed and certified the following C4 reports as required by law: (PDC ref #100768853 covering April, amended) and (PDC ref #100760029 covering April, original) – **also a violation of state law.**

For these reasons, Dhingra has misled both the PDC and the AG's office into believing something that is clearly and demonstrably false. Dhingra's false statement also **proves the veracity of allegations #4, #6, #8, and #9** that I made in my fourth and most recent complaint against her.

Dhingra's false statements in response to each of these four allegations constitutes a violation of **RCW 42.17A.750(2)(c)**, which prohibits a person from providing a false document to be filed with the commission and makes that violation a class C felony under **RCW 9.94A.**

Additionally, while it may not be part of **RCW 42.17A**, the Attorney General's Office and King County Prosecutor's Office should be aware that **RCW 9A.76.175** establishes that any person who knowingly makes a false or misleading material statement to a public servant is guilty of a gross misdemeanor. "Material statement" means a written or oral statement reasonably likely to be relied upon by a public servant in the discharge of his or her official powers or duties. I believe that Dhingra's false statement in response to **allegations #4, #6, #8, and #9** that she provided to the PDC qualifies as a violation of this statute.

2) State law requires that all political advertisement contain sponsor identification, which includes the sponsor's name and address. RCW 42.17A.320. Mediums defined as political advertisement that are required to contain sponsor ID include video presentation and any communication that is intended for the purpose of appealing directly or indirectly for votes or for financial support. Political advertisement is also defined as any communication intended to reach a large audience through multiple different methods, to include YouTube. WAC 390-05-290. Additionally, state law prohibits candidates from distributing political advertising that contains false statements of material fact about other candidates for public office. RCW 42.17A.335(1)(a).

a) On 5/27/2017, Dhingra uploaded 5 separate pieces of broadcast quality stock campaign footage to YouTube. The videos do not contain any discernable message and do not contain any written or spoken words. They include shots where Dhingra is talking to kids over the kitchen table, talking to a retired

sergeant, talking with a teacher, walking with a city councilmember, and confusedly staring off of a balcony.

These videos do not contain sponsor ID, as required by state law.

You can find links to the videos in question here:

- 1) <https://www.youtube.com/watch?v=er--y1ZEu58> (Manka with Retired Sergeant)
- 2) <https://www.youtube.com/watch?v=CuZC7uETgGY> (Manka Dhingra)
- 3) <https://www.youtube.com/watch?v=IPwHLq2Yh-c> (Manka with Friends in the Kitchen)
- 4) <https://www.youtube.com/watch?v=0J1Q2BHvH5K> (Manka with Lake Washington Teacher)
- 5) <https://www.youtube.com/watch?v=hnZtmNzZxoM> (Manka with Kirkland Councilmember)

Dhingra uploaded these videos to YouTube so that PACs could use the stock footage in their own independent expenditure video ads promoting Dhingra. This is a misguided and illegal attempt by Dhingra to bypass contribution limits and other important campaign finance regulations.

WAC 390-05-290 (2) defines political advertisement as communications that are distributed online, as these videos were. **WAC 390-05-290** and **RCW 42.17A.005** also define political advertising to include a mass communication used for the purpose of appealing, **directly or indirectly, for votes or for financial or other support or opposition in any election campaign**. These videos clearly meet the statutory definition of political advertisement and as such, are required to have the appropriate sponsor identification.

Dhingra's transmission of stock video footage to PACs for the purpose of making independent expenditure video ads qualifies as a political advertisement (and illegal coordination) under relevant rules and statutes. As such, it is required to bear sponsor ID, which it fails to do – a violation of state law.

b) Dhingra's campaign team uploaded a video to YouTube containing general messaging points and phone bank instructions for the Dhingra campaign. See the link here:

https://www.youtube.com/watch?v=kJPG_A7t5Nc&feature=youtu.be&utm_source=Sister+Di+strict+Project&utm_campaign=6371648730-

EMAIL_CAMPAIGN_2017_05_16&utm_medium=email&utm_term=0_834b1735b3-6371648730-59436025&mc_cid=6371648730&mc_eid=b509e2de8a

This video qualifies as political advertising per the rules and statutes listed above. Unfortunately, this video does not include Sponsor ID, as required by state law. The video must be edited to include Sponsor ID immediately.

c) Dhingra's campaign team put together an "Informational Sheet" on Dhingra and her opponents in the 45th LD race. (**See Exhibit A**). This sheet qualifies as a political advertisement under the definitions of **WAC 390-05-290** and **RCW 42.17A.005**, however it does not bear sponsor ID, a violation of state law.

Unfortunately, this sheet appears to contain many false statements of material fact, which is also a violation of state law. It is extremely concerning that Dhingra and her campaign are actively spreading demonstrably false information about her opposition.

- i) The statement that Jinyoung Englund “opposes... .. reducing vehicle fees”. This appears false. Englund appears to have made reducing vehicle fees part of her campaign platform. Conversely, Dhingra and her political party support higher car tab fees and have actively promoted them, which is interesting, but not illegal.
- ii) The statement that Englund “has promoted anti-choice policies, tax cuts for the wealthy, budgets that slash Medicare and health care”. This statement is false. The Dhingra campaign provides no evidence to back up any of these statements.
- iii) The statement that “[the] only way state income tax will be imposed will be after either an initiative or referendum.” This is a blatantly false statement of material fact. An income tax can be imposed without a vote of the people. In fact, imposition of an income tax without a vote of the people is one of the prime goals and objectives of the Senate Democratic Caucus from which Dhingra receives support and hopes to join. On information and belief, Dhingra has promised the leadership of the Senate Democratic Caucus that, if elected, she will vote to enact a direct income tax or capital gains income tax.

These are serious falsehoods that Dhingra must correct immediately to avoid additional penalties from the PDC or AG's office.

3) State law requires that committees file regular, timely, accurate reports disclosing contributions, expenditures, in-kind contributions, debts & obligations, and pledges. RCW 42.17A.235(2). The report disclosing expenditures, in-kind contributions, debts & obligations, and pledges is entitled "Campaign Summary, Receipts and Expenditures" and is designated by the Commission as form C-4, pursuant to WAC 390-16-041. This report is due monthly until the twenty-first day of the month before an election at which time the report is due twenty-one days before the election, seven days before the election, and on the tenth day of the month following the election. State law also specifies the amount of contributions that candidates can receive from various entities. RCW 42.17A.405. Over-limit contributions must be returned within 10 business days of receipt. WAC 39016312. An expenditure is defined to include "a promise to pay...." RCW 42.17A.005(20). For the purposes of this chapter, agreements to make expenditures, contracts, and promises to pay may be reported as estimated obligations until actual payment is made." Id. Contingent liabilities and contracts for services yet to be rendered are also reportable as debt. WAC 390-16-042, WAC 390-05-295. Further, committees must properly break down their expenditures to include certain sub-vendor information. WAC 390-16-205.

Contributions

- a) According to the PDC, the accurate C3 for deposits made from 6/12/2017 to 6/18/2017 was due on 6/19/2017. Unfortunately, the Dhingra campaign failed to file an accurate C3 until 6/20/2017, well past

the statutory deadline. Specifically, the original C3 (#100770153) failed to properly split contributions (totaling \$500) made by Carolyn Lee. Lee had made two separate contributions of \$46.39 and \$453.61 respectively, however, the initial C3 incorrectly reported that she made one contribution of \$500.

Failure to Breakdown Expenditures

- a) The Dhingra campaign failed to accurately breakdown the following expenditures. *(See Exhibit B)*
- b) On information and belief, there may be other expenditures that Dhingra has failed to accurately report/break down. I encourage the PDC and AG's office to subpoena Dhingra's campaign records to determine if this is the case.

Unreported Debts and Obligations

a) Manka Dhingra has contracted with various individuals and entities to provide services to her campaign. This is contractual debt that must be reported on her C4s. Unfortunately, this is not currently happening as required by statute. Dhingra's interpretation of the statute that she contained in her earlier response is inconsistent with a plain reading of the statute.

Andy Lo – Debt reported to Andy Lo does not accurately reflect what Dhingra intends to pay him for treasury services throughout the entire campaign or – if it does – it is an in-kind contribution from Andy Lo to the Dhingra campaign FAR in excess of applicable contribution limits. See **WAC 390-16-042, WAC 390-05-295**.

NWP Consulting -- Debt reported to NWP Consulting does not accurately reflect what Dhingra is obligated to pay NWP Consulting for the entire campaign, or – if it does – it is an in-kind contribution from NWP Consulting to the Dhingra campaign FAR in excess of applicable contribution limits. See **WAC 390-16-042, WAC 390-05-295**.

Katherine Bobman Consulting – Debt reported to Katherine Bobman Consulting does not accurately reflect what Dhingra is obligated to pay Katherine Bobman Consulting for the entire campaign, or – if it does – it is an in-kind contribution from Katherine Bobman Consulting to the Dhingra campaign FAR in excess of applicable contribution limits. See **WAC 390-16-042, WAC 390-05-295**.

Dillon Gilbert – Debt reported to Dillon Gilbert does not accurately reflect what Dhingra is obligated to pay Dillon Gilbert for the entire campaign, or – if it does – it is an in-kind contribution from Dillon Gilbert to the Dhingra campaign FAR in excess of applicable contribution limits. See **WAC 390-16-042, WAC 390-05-295**.

Louise O'Rourke – Debt reported to Louise O'Rourke does not accurately reflect what Dhingra is obligated to pay Louise O'Rourke for the entire campaign, or – if it does – it is an in-kind contribution from Louise O'Rourke to the Dhingra campaign FAR in excess of applicable contribution limits. See **WAC 390-16-042, WAC 390-05-295**.

b) The Dhingra campaign failed to accurately report the following debts in April:

Vendor	Date	Amou	Description	Failure to Report as Debt
AMERICAN EXPRESS	2017-05-30	6174.56	THE WESTIN - SEATTLE	This should have been reported as debt for the month of April, but was not.
NORTHWEST PASSAGE CONSULTING	2017-05-18	1389	OVERNIGHT PRINTING - SEATTLE	This should have been reported as debt for the month of April, but was not.
DEMOCRACY ENGINE	2017-05-18	300.9	MERCHANT SERVICES	This should have been reported as debt for the month of April, but was not.
PAYCHEX	2017-05-15	463.06	US TREASURY/STATE OF WA - PAYROLL TAXES	This should have been reported as debt for the month of April, but was not. This should not be confused with the \$479.56 expenditure to PayChex that WAS reported correctly as debt in April and paid in May.
EMPOWER ENGINE	2017-05-12	1500	MAPPING PLATFORM	This should have been reported as debt for the month of April, but was not.
MERCHANTS CAFE	2017-05-12	350	RENTAL DEPOSIT	This should have been reported as debt for the month of April, but was not.

c) On information and belief, there may be other debts and obligations that Dhingra has failed to report. I encourage the PDC and AG's office to subpoena Dhingra's campaign records to determine if this is the case.

In Kind Contributions

- a) The Dhingra campaign has failed to disclose the in-kind contribution of staff time and resources it has received from the **Sister District organization**. As you can see from the e-mail communications, it is organizing volunteers on behalf of Dhingra and is even providing them with resources to use for phone banking. (**See Exhibit C**). This organization has spent considerable staff time and resources to benefit Dhingra's campaign, and this must be reported on form C4.
- b) The "Children's Campaign Fund" sent out paid Facebook advertisements benefitting Dhingra's candidacy. (**See Exhibit C**). Because they engaged in the republication of Dhingra's campaign photo, this advertisement constitutes an in-kind contribution to Dhingra's campaign per **RCW 42.17A.005 (13)(a)(iii)**. Unfortunately, Dhingra did not list it as an in-kind contribution to her campaign.
- c) On information and belief, there may be other in-kind contributions that Dhingra has failed to report. I encourage the PDC and AG's office to subpoena Dhingra's campaign records to determine if this is the case.

Pledges

- a) According to e-mail evidence, the Dhingra campaign received a pledge of \$2000 on 5/30/2017 (\$1000 primary/\$1000 general) that was not reported on its C4 covering the time period of May. (**See Exhibit D.**) It should be noted that in the entire campaign thus far, Dhingra has only accurately recorded three pledges. This pledge serves as additional evidence that the Dhingra campaign is systematically failing to properly/timely report campaign pledges.

- b) On information and belief, Dhingra has received unreported pledges from the Washington Senate Democratic Campaign (WSDC), Washington State House Democratic Campaign Committee (WSHDCC), WEA, SEIU 775, SEIU 925, SEIU 1199, WFSE, AFL-CIO, WSLC, AFL-CIO, WSAJ, WA & Northern Idaho District Council of Laborers PAC, New Direction PAC, Nick Hanauer, and Tom Steyer.
- c) On information and belief, Dhingra failed to report the following contributions as pledges for the preceding C4 reporting period, even though they had been communicated to her. (I.E. Teresa Lutterman said she should give \$500 in May, but it wasn't reported as pledge on the C4 for May.) *(See Exhibit D).*

4) State law prohibits anyone other than the treasurer or deputy treasurer from making deposits into the campaign's bank account. RCW 42.17A.220 (1).

On information and belief, someone other than Andy Lo has been depositing campaign checks into the Dhingra campaign bank account.

It should be noted that Dhingra's treasurer Andy Lo resides in Seattle. According to the address Lo has on file with the King County Elections Office, it is approximately a 16.4 miles from his house to the Redmond BECU. This equates to a 32.8 mile roundtrip drive for every day the Dhingra campaign deposits contributions they have received, which is nearly every day. It defies plausibility that Lo is actually making this trip and depositing the checks for a mere \$500/month. However, if Lo is actually making this daily trip, then it should become eminently clear that the market value of his services exceed the \$500/month that he is being paid by the Dhingra campaign. Additionally, because the gas consumed would be entirely a campaign related expense, this might have to be disclosed retroactively by Lo as an in-kind contribution to the Dhingra campaign. Note that the gas consumed would be subject to contribution limits.

The PDC should immediately issue a subpoena for the checks that the Dhingra campaign has deposited into the campaign account. I believe that the person who signed the checks or bank deposit slips as an endorser is someone other than Andy Lo – which is a violation of state law.

5) State law requires that candidates file a personal statement of financial affairs. RCW 42.17A.700, .710. State law further requires that candidates accurately break down the stocks and other assets held in financial accounts that they have control over. WAC 390-24-010. State law also establishes that the provisions of RCW 42.17A are to be construed liberally to effectuate the purposes of the act, to include the full disclosure of personal financial affairs. RCW 42.17A.904.

RCW 42.17A.710 and WAC 390-24-010 clearly requires that filers must disclose the stocks that they own. The fact that Dhingra has chosen multiple brokerage accounts and other financial instruments to conceal her holdings does not allow her to hide the actual stocks that she owns.

The voters of the 45th District deserve a full and transparent disclosure of Dhingra's finances in order to assess what conflicts of interest she would bring to the Legislature.

6. State law requires that both the treasurer and the candidate must certify all contribution and expenditure reports as correct and accurate. RCW 42.17A.235 (7).

From her false response to the PDC I described early above, we can see that Manka Dhingra has indeed failed to certify these reports. Instead, Dhingra's electronic signature is being auto-generated on these contribution and expenditure reports by her Treasurer Andy Lo, in violation of state law. This practice must cease immediately.

7. State law requires that the treasurer or candidate preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. RCW 42.17A.235 (6).

I have reason to believe that Dhingra and Lo have failed to maintain certain records from the campaign. This failure to preserve documents (spoliation) constitutes a violation of state law. I will reiterate my belief that the PDC should issue a subpoena for her campaign documents to expose her failure to preserve documents and other violations.

8. State law requires that candidate committees identify any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic, or policy decisions on behalf of the committee as officers on their C-1 form. RCW 42.17A.205, WAC 390-05-245. State law further requires that accurate names, addresses, and titles of its officers be included on the committee's C-1. RCW 42.17A.205(2)(c).

On information and belief, the Dhingra campaign has failed to list several people who make, direct, or authorize contributions, expenditures, strategic, or policy decisions on behalf of the committee as committee officers, including but not limited to: Andy Lo, NWP Consulting, Katherine Bobman Consulting, Dillon Gilbert, Louise O'Rourke, Harjit Singh, Adam Bartz, and Alex Bond. From Dhingra's earlier response, we can see that Northwest Passage Consulting has made expenditures to Facebook that Dhingra was unaware of. This further proves that NWP Consulting has been making illegal spending decisions for the Dhingra campaign, despite not being listed as an officer.

9. State law prohibits expenditures from being made or incurred by any candidate committee unless authorized by the person or persons named on the committee's C-1 registration form. RCW 42.17A.425.

On information and belief, unlisted officers have made numerous unauthorized expenditures on behalf of Dhingra, despite not being listed on the committee's C-1 registration form. These unlisted officers

include, but are not limited to: Andy Lo, NWP Consulting, Katherine Bobman Consulting, Dillon Gilbert, Louise O'Rourke, Harjit Singh, and Alex Bond. This constitutes a violation of state law that must be rectified immediately. From Dhingra's earlier response, we can see that Northwest Passage Consulting has made expenditures to Facebook that Dhingra was unaware of. This further proves that NWP Consulting has been making illegal spending decisions for the Dhingra campaign, despite not being listed as an officer.

10. State law requires that the treasurer or candidate shall maintain books of account accurately reflecting all contributions and expenditures on a current basis within five business days of receipt or expenditure. State law also states that it is a violation of RCW 42.17A for a candidate or political committee to refuse to allow and keep an appointment for an inspection to be conducted during these authorized times and days. RCW 42.17A.235 (4).

On 6/16/2017, I sent an e-mail to Dhingra, her campaign treasurer, and her campaign to request an appointment to inspect her books. I am legally entitled to exercise this right per state law. Unfortunately, more than a week has gone by, and Dhingra's campaign has refused to honor my request to set up the appointment to view books. This refusal to be transparent with her campaign finances and follow state campaign finance law demonstrates a pattern of behavior for Dhingra and her campaign. In addition to investigating her, PDC and AG staff must make it clear to Dhingra that her campaign is legally obligated to provide anyone so interested with the opportunity to view her campaign books. *(See Exhibit E.)*

11) State law prohibits illegal collaboration between candidates and committees who do independent expenditures, particularly if they exceed applicable contribution limits. RCW 42.17A.405.

Unfortunately, it is highly likely that Dhingra or her campaign agents have illegally collaborated with Eastside Leadership Council, a political committee that has made \$12,500 worth of expenditures benefitting Dhingra's candidacy. This constitutes an (unreported) in-kind contribution to Dhingra's campaign substantially in excess of the maximum allowable by law. This is a clear violation.

The PDC should immediately subpoena the records of the Committee to confirm and verify the true degree, scope, and level of willful malicious collusion to which this violation has occurred.

Conclusion

The PDC should investigate the possibility that Manka Dhingra 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.

I have reason to believe there are other provisions of **RCW 42.17A** which have been violated, or are currently being violated by Dhingra's campaign. The PDC and AG's office should conduct a thorough review of Dhingra's campaign to identify all violations. Please don't hesitate to contact me if you need any additional information.

Sincerely,

Glen Morgan

Exhibit A (Pg. 1 of 3) – “Informational Sheet”

INFORMATIONAL SHEET ON MANKA DHINGRA AND OPPONENTS

Manka Dhingra: Democratic Candidate for the WA State Senator for District 45

Republican Opponent: Jinyoung Lee Englund
Independent Candidate: Parker Harris

HISTORY OF THE SEAT

- The 45th District Senate seat was left vacant when Senator Andy Hill died in October of 2016.
- Dino Rossi currently holds the seat. He has run for governor as a Republican twice, and once for U.S. senator. He will not campaign for re-election.

WHY IS THIS RACE IMPORTANT?

- Republicans control the Washington State Senate, but barely! They have a narrow, 25-24 functional majority.
- Democrats already control the governor’s office and the House of Representatives, but they hold the majority by just one vote.
- Winning the 45th would give Democrats the ability to pass any bill they want.
- The race will be won or lost by the voter engagement operations each party is able to build, to get voters to pay attention to the candidates and mail in their ballots without the pull of a presidential election.

ELECTION DATES

August 1, 2017: Primary election

- July 3: online voter registration deadline
- July 14: deadline for ballots to be mailed out to voters
- July 24: new voter registration deadline

November 7, 2017: General election

- October 9: online voter registration deadline
- October 7-14: voter pamphlets mailed out
- October 20: deadline for ballots to be mailed out to voters
- October 30: new voter registration deadline

WHY IS MANKA RUNNING?

- to address critical needs in education funding, mental health, violence prevention, and to protect the rights of women.
- supports Pro-choice;
- relies on science and data to make decisions;
- supports a diverse community.

WHO IS MANKA?

- A Senior Deputy Prosecuting Attorney with the King County Prosecuting Attorney’s Office: has been with the office since 2000.
 - As Chair of King County’s Therapeutic Alternative Unit, supervises the Regional Mental Health Court, which received the Randy Reyelle Award by the WA State Psychiatric Association.
 - oversees Veterans Court that serves veterans with disabilities
 - oversees the Community Assessment and Referral for Diversion program.
 - To reform and improve our criminal justice system, worked with State Department of Social and Human Services, the Washington Association of Prosecuting Attorneys, legislators, and the Governor’s office to ensure individuals get the treatment they need to return to being productive members of our community.
- A mental health and crisis intervention expert
 - A Board Member of NAMI (National Alliance on Mental Illness) Eastside, which works to improve the quality of life of all those affected by mental illness
 - Manka earned the organization’s highest award earlier this year.

Exhibit A (Pg. 2 of 3) – “Informational Sheet”

- Trains law enforcement and recently started a collaborative effort with King County law enforcement agencies to coordinate response and help avoid tragedy.
- works directly with Harborview Hospital, mental health professionals and our courts to improve criminal justice outcomes for mentally ill individuals—seeking to close the revolving door of jail, homelessness, and crime.
- Award winning PTSA mom
- Anti-domestic violence advocate
- Community leader
- A longtime advocate for women and immigrant rights
 - co-founded Chaya (now API Chaya) to end systemic violence through education, prevention, and organizing.
 - served on the Seattle Police Department Muslim, Arab, and Sikh Advisory Council to address hate crime issues in our region in the wake of 9/11.
- Prior to becoming a King County Deputy Prosecuting Attorney, she interned with the State Attorney General's Office in their Criminal Division assisting with Sexually Violent Predator cases.
- clerked for Justice Barbara Madsen at the Washington State Supreme Court from September 1997 to June 1998.

MANKA'S PERSONAL INFORMATION

- holds a JD from the UW School of Law
- holds a BA in History and Political Science from the UC Berkeley
- A mother of two children who attend Redmond Middle School and Redmond High School,
- Manka received the PTSA Golden Acom Award for her work at Redmond Elementary School and remains a proud Girl Scout cookie mom.
- Manka and her husband, Harjit Singh, a Distinguished Engineer at SpaceX, live in the Education Hill neighborhood of Redmond.

MANKA'S ENDORSEMENTS

See list on the back of the purple and gold single fold brochure.

Senator Patty Murray
 King County Executive Dow Constantine
 King County Council Member Claudia Balducci
 King County Council Member Jeanne Kohl-Welles
 Senate Minority Leader Sharon Nelson, 34th LD
 State Sen. Guy Palumbo, 1st LD
 State Sen. Kevin Ranker, 40th LD
 State Sen. Jamie Pederson, 43rd LD
 State Rep. Tana Senn, 41st LD
 Redmond City Council Member Angela Birney
 Woodinville City Council Member Elaine Cook
 Chair of Washington State Democrats Tina Podlodowski
 Former State Rep Marci Maxwell, 41st LD
 Former Redmond City Council Member Nancy McCormick

WEBSITE: www.electmanka.com

Link to youtube video: <https://www.youtube.com/watch?v=s4pNWbLRGIU>

Interview with Indivisible WA: <https://soundcloud.com/wsip/ep-16-45th-ld-state-senate-candidate-manka-dhingra-plus-march-for-truth-founder-holly-oreilly>

Training video at YouTube, made by Manka's campaign staff
https://www.youtube.com/watch?v=kJPG_A7t5Nc&feature=youtu.be&utm_source=Sister+District+Project&utm_campaign=6371648730-EMAIL_CAMPAIGN_2017_05_16&utm_medium=email&utm_term=0_834b1735b3-6371648730-59436025&mc_cid=6371648730&mc_eid=b509e2de8a

Check your email for link for phone banking OR go to her website. The code is posted on Sunday and good until the following Saturday.

SUMMARY OF OTHER CANDIDATES

Exhibit A (Pg. 3 of 3) – “Informational Sheet”

JINYOUNG LEE ENGLUND: Republican¹

- Recently moved into district
 - Listed her residence as Virginia although registered to vote in the 48th LD (Bellevue) until April 4, 2017 when she switched to the 45th
- Recruited by the Republicans and endorsed by Dino Rossi and Kathy Lambert
- Republican political operative
 - Worked for Cathy McMorris Rodgers, Dino Rossi (campaign mgr.), the Heritage Fdn., Romney/Ryan transition team, advisory role at RNC
- Has promoted anti-choice policies, tax cuts for the wealthy, budgets that slash Medicare and health care
- Opposes state income tax and reducing vehicle fees (increased in vote for Sound Transit)
 - Note only way state income tax will be imposed will be after either an initiative or referendum vote by the people
- Fully fund education
- Reduce traffic congestion
- **WEBSITE:** jinyoungenglund.com, where you can view her videos

PARKER HARRIS: Independent²

- Teacher
- Concerned about political divisions: will not blindly fight for 1 party
- repeal regressive sales tax, impose small income tax; lower or repeal B&O tax for small companies
- Wants to fully fund education, reduce class size, attract more teachers to state, opposed to standardized testing
- Single payer health care system to be financed by a payroll tax; Obamacare did not solve problems
- Reverse Citizens United; supports Seattle’s effort to provide equal opportunity to all citizens
- Protect forests, waters and wetlands; Support green practices in transportation, industry and farming; Address Global warming and improve safety and disaster response plans.
- **WEBSITE:** parkerforsenate.org, where you can view his video

¹ Source: www.wa.democrats.org and www.jinyoungenglund.org

² Source: www.parkerforsenate.org

Exhibit B (Pg. 1 of 3) – “Failure to Breakdown Expenditures”

Vendor	Date	Amount	Description	Failure to Breakdown Expenditure
OROURKE LOUISE	2017-05-31	\$2,750.00	CAMPAIGN MANAGER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
GILBERT DILLON	2017-05-31	\$2,500.00	OUTREACH DIRECTOR WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
AUSTRENG DANE	2017-05-31	\$1,695.65	FIELD ORGANIZER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
FERGUSON LAINIE	2017-05-31	\$1,695.65	FIELD ORGANIZER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
JACKSON ASHLEY	2017-05-31	\$1,043.48	FIELD ORGANIZER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
AUSTRENG DANE	2017-05-31	\$50.46	76 - KIRKLAND	Failure to describe purpose of the gasoline. Could also be potentially illegal personal use of campaign money because it was used to fill the entire tank at a gas station and not just personal reimbursement for miles traveled.
GILBERT DILLON	2017-05-30	\$94.07	U-HAUL - KIRKLAND	Failure to describe campaign nexus for the u-haul truck rental. Potential illegal use of campaign money.
OFFICE DEPOT	2017-05-19	\$289.94	OFFICE SUPPLIES	Failure to accurately describe the supplies being purchased.
COSTCO	2017-05-18	\$196.73	FOOD	Failure to adequately describe food being purchased. Failure to note if this food was for personal or campaign related consumption.
OROURKE LOUISE	2017-05-15	\$2,750.00	CAMPAIGN MANAGER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
GILBERT DILLON	2017-05-15	\$2,500.00	OUTREACH DIRECTOR WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
NORTHWEST PASSAGE CONSULTING	2017-05-09	\$350.00	NORTHWEST PASSAGE CONSULTING	Failure to accurately describe what this design fee correlates to/identify which item was designed for this expenditure.
NORTHWEST PASSAGE CONSULTING	2017-05-09	\$283.86	NORTHWEST PASSAGE CONSULTING	Failure to identify which subvendor did the printing in the description field.
NORTHWEST PASSAGE CONSULTING	2017-05-09	\$276.40	NORTHWEST PASSAGE CONSULTING	Failure to identify which subvendor did the printing in the description field.
AIO MEDIA	2017-05-04	\$3,000.00	AIO MEDIA	Failure to identify which video was produced.
KATHERINE BOBMAN CONSULTING	2017-05-02	\$328.05	KATHERINE BOBMAN CONSULTING	Failure to identify which food was purchased.
KATHERINE BOBMAN CONSULTING	2017-05-02	\$172.13	KATHERINE BOBMAN CONSULTING	Failure to identify which supplies were purchased for the event.
KATHERINE BOBMAN CONSULTING	2017-05-02	\$170.00	KATHERINE BOBMAN CONSULTING	Failure to identify which venue was rented from the City of Redmond.
KATHERINE BOBMAN CONSULTING	2017-05-02	\$150.00	KATHERINE BOBMAN CONSULTING	Failure to identify subvendor in the description field.

Exhibit B (Pg. 2 of 3) – “Failure to Breakdown Expenditures”

KATHERINE BOBMAN CONSULTING	2017-05-02	\$37.28	KATHERINE BOBMAN CONSULTING	Failure to identify which supplies were purchased for the event.
OROURKE LOUISE	2017-05-01	\$2,750.00	LOUISE OROURKE	Failure to identify which entities actually received the payroll taxes.
GILBERT DILLON	2017-05-01	\$2,500.00	DILLON GILBERT	Failure to identify which entities actually received the payroll taxes.
LO ANDY	2017-05-01	\$526.03	ANDY LO	Part of this expenditure is a reimbursement, however the description field does not include what the reimbursement is being made for or what was actually purchased by Lo and from whom.
CREATIVE MOBILE TECH	2017-04-27	\$76.33	RIDE	Failure to identify the campaign nexus of this "ride".
DULLES AIRPORT TAXI	2017-04-26	\$85.80	RIDE	Failure to identify the campaign nexus of this "ride".
NORTHWEST PASSAGE CONSULTING	2017-04-25	\$650.00	DESIGN	Failure to accurately describe what this design fee correlates to.
NORTHWEST PASSAGE CONSULTING	2017-04-25	\$625.00	OVERNIGHT PRINTING - SEATTLE	Failure to identify which items were purchased in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-25	\$123.65	SIP THAI BISTRO - REDMOND	Failure to identify which items were purchased in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-25	\$57.50	FACEBOOK - MENLO PARK	Failure to identify run date of the Facebook advertisement.
ALASKA AIRLINES	2017-04-21	\$158.40	AIRFARE	Failure to identify purpose/campaign nexus of the airfare.
CITY OF REDMOND	2017-04-17	\$115.00	VENUE RENTAL	Failure to identify which venue is being rented.
OROURKE LOUISE	2017-04-14	\$2,750.00	CAMPAIGN MANAGER WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
GILBERT DILLON	2017-04-14	\$2,500.00	OUTREACH DIRECTOR WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
PAYCHEX	2017-04-14	\$682.96	US TREASURY/STATE OF WA - PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
GILBERT DILLON	2017-04-13	\$2,000.00	DILLON GILBERT	Failure to identify which entities actually received the payroll taxes.
UNITED AIRLINES	2017-04-12	\$1,444.80	AIRFARE	Failure to identify purpose/campaign nexus of the airfare.
DHINGRA MANKA	2017-04-07	\$76.27	LOAN REPAYMENT	Failure to identify which loan was being repaid.
DHINGRA MANKA	2017-04-07	\$36.38	LOAN REPAYMENT	Failure to identify which loan was being repaid.
DHINGRA MANKA	2017-04-07	\$5.00	LOAN REPAYMENT	Failure to identify which loan was being repaid.
DHINGRA MANKA	2017-04-07	\$5.00	LOAN REPAYMENT	Failure to identify which loan was being repaid.

Exhibit B (Pg. 3 of 3) – “Failure to Breakdown Expenditures”

KATHERINE BOBMAN CONSULTING	2017-04-05	\$490.00	KATHERINE BOBMAN CONSULTING	Failure to identify subvendor in the description field.
KATHERINE BOBMAN CONSULTING	2017-04-05	\$210.00	KATHERINE BOBMAN CONSULTING	Failure to identify subvendor in the description field.
KATHERINE BOBMAN CONSULTING	2017-04-05	\$30.00	KATHERINE BOBMAN CONSULTING	Failure to identify subvendor in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$1,310.00	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$646.75	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
PAYCHEX	2017-04-03	\$536.72	PAYCHEX	Failure to identify which employees these payroll taxes correlate to.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$150.00	NORTHWEST PASSAGE CONSULTING	Failure to accurately describe what this design fee correlates to.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$111.75	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$79.00	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$60.00	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
NORTHWEST PASSAGE CONSULTING	2017-04-03	\$60.00	NORTHWEST PASSAGE CONSULTING	Failure to identify subvendor in the description field.
OROURKE LOUISE	2017-03-31	\$4,000.00	CAMPAIGN MANAGEMENT WAGES/PAYROLL TAXES	Failure to identify which entities actually received the payroll taxes.
NORTHWEST PASSAGE CONSULTING	2017-03-23	\$323.35	OVERNIGHT PRINTING - SEATTLE	Failure to include items purchased in description field.
NORTHWEST PASSAGE CONSULTING	2017-03-21	\$1,064.15	NORTHWEST PASSAGE CONSULTING	Failure to include subvendor, items purchased in description field.
NORTHWEST PASSAGE CONSULTING	2017-03-21	\$250.00	NORTHWEST PASSAGE CONSULTING	Failure to accurately describe what this design fee correlates to.
DHINGRA MANKA	2017-03-09	\$61.05	LOAN REPAYMENT	Failure to identify which loan was being repaid.
DHINGRA MANKA	2017-03-09	\$59.40	LOAN REPAYMENT	Failure to identify which loan was being repaid.
DHINGRA MANKA	2017-03-09	\$13.14	LOAN REPAYMENT	Failure to identify which loan was being repaid.
KATHERINE BOBMAN CONSULTING	2017-03-06	\$160.00	KATHERINE BOBMAN CONSULTING	Failure to include subvendor, items purchased in description field.
KATHERINE BOBMAN CONSULTING	2017-03-06	\$25.00	KATHERINE BOBMAN CONSULTING	Failure to include subvendor, items purchased in description field.
THE BLUE DEAL	2017-03-03	\$1,166.00	HATS	Failure to identify the subvendor. The Blue Deal does not produce these items in house.

Exhibit C (Pg. 1 of 3) – Unreported In-Kind Contributions

Phone Banking

Janet McKinney <cedarwaxwings@gmail.com> Sat, Jun 17, 2017 at 9:22 AM
 To: [REDACTED] Bob Doll <robertjdoll@yahoo.com>
 Cc: Jeff Mount <gwmount@hotmail.com>, Marc Oommen <marc.oommen@gmail.com>, Viscalla <viscalla@aol.com>

Hi [REDACTED]

Just in case you didn't receive by earlier email here is some information on the Manka phone banking. In the earlier email, there was more information on phone banking and Manka.

The Skagit Democrats are working with the local Sister Districts Project CD 1 & 2 to coordinate phone banking. Learn more about sister district project by going to <https://www.sisterdistrict.com/>.

Kathy Kuba is leading the phone banking for the Sister Districts. Please email Kathy Kuba, kkuba@kubaco.com, to get on her phone banking email list.

Kathy coordinates the phone banking and will start sending you emails with the necessary information to phone bank (like passcodes).

If you want to learn more about phone banking in person, Sister District is having a meeting Thursday, July 13, 6 to 8 pm, Burlington Library.

Thank You for your interest in helping Manka Dhingra.

Janet McKinney
 Skagit County Democrats

Just a reminder to join us for phonebanking tonight if you can! You can make calls from the comfort of your own home. Please make calls for any portion of the open hours that you're able to. Thank you!

TONIGHT! AND EVERY TUESDAY 6-8 PM PT
 Trainings: [Audio \(mechanics\)](#) // [Video \(messaging\)](#)
 This Week's [Open VPB](#) Code: 917722I-3325

Friends,

You're receiving this email because you've been assigned [Manka Dhingra](#), [Washington State Senate, Legislative District 45](#), as your first Sister Race. Manka's campaign is getting incredible traction and attention, and for good reason. This election will determine whether Democrats have a [true majority](#) in the Washington State Senate. **Can you help us flip the 45th by making a few phone calls tonight?**

Open hours are tonight---and every Tuesday---from 6-8 PM PT. Quick first steps if you've never done this before (and welcome back, if you have!):

1. **Check out the trainings.** Listen to the campaign's training [audio](#) and watch the quick campaign training [video](#) on messaging.
2. **Login to [Open VPB](#)** (or complete the quick sign up) and when prompted, enter this VPB Code: [917722I-3325](#).
3. **Start making calls!** Follow the instructions on the screen and use your own phone. You can get together with a few people for a party, or do it from the comfort of your own home.

If you have any questions during the open hours, please feel free to reach out to [Lainie Ferguson](#), one of Manka's fantastic field organizers. You can reach her at 360-431-9355 or lainie@electmanka.com.

We're holding phonebanking open hours every Tuesday from 6-8 PM PT. (Note the slight time change from previous messages---we'll be using 6-8 PM going forward.) These times are dedicated for Sister District volunteers to phonebank in parties, or individually, for Manka. **You don't have to make calls for the entire two hours---even half an hour once a week can make a big difference.** But if those times aren't convenient for you, no worries! Please just let us know by replying to this email.

Lala & Gaby
 Sister District Project



Sister District Project shared Sister District Project - WA-7's event.
 May 11

If you live in the Seattle area, please join us on Saturday for a volunteer training and to meet Manka in person!



MAY 13 Sister District All-Volunteer Meeting & ...
 Sat 1 PM · Phinney Neighborhood Association · ...
 Causes · 274 people ★ Interested

8 2 Comments

Like Share

 **Kathy Polhemus Rawle** Cannot make it. Please post info after.
 Like · May 11 at 9:41am

 **Leslie Oldenburg** Will this be available to stream?
 Like · May 13 at 12:43am

Exhibit C (Pg. 2 of 3) – Unreported In-Kind Contributions

Lala Wu
May 23

Weekly Sister District phonebanking for Manka tonight 6:30-8:00pm. And every Tuesday! Check out trainings, login info, and this week's access code here: <http://bit.ly/2rvINVb>



Like **Share**

15

View 1 more comment

Claire Foster Phone banking tonight, 6-8pm! Tonight's open VPB code is F23822I-8840.
Like · June 13 at 4:19pm · Edited

Claire Foster Tuesday's phone banking day! 6-8pm, today's VPB code is DFD822D-3961

Alix Foster shared a link.
May 16

Some of you are having problems with the links I posted. Please use this.



Phonebanking for Manka Dhingra Starts Tonight
Training Video Enclosed

MAILCHI.MP

Like **Share**

6

Sarah Neal This is great, thank you!
Like · May 16 at 4:31pm

Rita Bosworth shared a link.
April 19

Sister District Project is proud to support Manka Dhingra for Washington State Senate District 45. A win for Manka will return a true majority of the Washington State Senate to Democrats. Please like, share, follow, and donate to Manka!



I just gave to Manka Dhingra!
I just donated to @electmanka for WA45 with @SisterDistrict! Lets go from #redtoblue
SECURE.ACTBLUE.COM

Like **Share**

25

1 Comment 17 Shares

Exhibit C (Pg. 3 of 3) – Unreported In-Kind Contributions

Children's Campaign Fund
Sponsored · 40

CCF proudly endorses Manka Dhingra for the 45th Legislative District Senate! We believe that Manka Dhingra will be a strong advocate for all of Washington's children and families.

"Our children are the future of our state and country. They are also frequently a very vulnerable population. Public funding must be focused on making sure that children are cared for on all fronts. From improving our current disastrous public school funding situation, to ensuring that we have a robust healthcare system for Washington's children as we face the removal of the ACA on a federal level, I will make sure these issues take top priority when the legislature decides how to allocate it's budget."



6 Shares

Like Comment Share

61

Joan McBride
Congrats Manka!!
Tuesday at 7:22 PM · Like · Reply · 4

Michele Meaker Pin
Lov lov lov!
Tuesday at 7:53 PM · Like · Reply · 3

Rene Murry
Very excited to support Manka Dhingra!
Tuesday at 8:04 PM · Like · Reply · 3

Write a comment... Post

Children's Campaign Fund wants to reach people interested in Election based on activity such as liking Pages or clicking on ads.

There may be other reasons you're seeing this ad, including that Children's Campaign Fund wants to reach people ages 18 and older who live near Olympia, Washington. This is information based on your Facebook profile and where you've connected to the internet.

Exhibit D (Pg. 1 of 3) – Unreported Pledges

[REDACTED]
Sent: Tuesday, May 30, 2017 3:51 PM

To: louise@electmanka.com; info@electmanka.com

Subject: Contribution/Possible to set up meeting?

Hello --

My name is [REDACTED] and I live in Olympia. I frequently lobby the Legislature on issues relating to sportsmen and outdoor recreation, specifically hunting, fishing, and access/usage of our public lands.

I have been following your campaign since you announced, and have been impressed with what I've seen so far. Keep up the good work!

I will be sending Dhingra a personal check for \$2000, but I travel up to the Bellevue area pretty often and I was hoping to hand it off in person. Would it be possible for me to set up a meeting to meet Dhingra and pass off the contribution and chat with her for ~15-20 minutes about issues relating to outdoor recreation?

For her convenience, I was thinking we could grab some coffee at the Starbucks that's next to the QFC off of Redmond way. But if you know of a better/quieter place I'd be happy to meet there.

I know that Dhingra must have an incredibly busy schedule, but would it be possible to make any of the following times work:

Wednesday 6/14 -- 1:00 PM to 3:00 PM

Thursday 6/15 -- 1:00 PM to 3:00 PM

Friday 6/16 -- 6:00 PM to 8:00 PM

Saturday 6/17 -- 1:00 PM to 3:00 PM

Sunday 6/18 -- 11:00 AM to 7:00 PM

Please let me know if this would be possible so I can block the time out on my calendar. Thank you!

Sincerely,

[REDACTED] cell

Exhibit D (Pg. 2 of 3) – Unreported Pledges

Unreported Pledges (weren't reported on preceeding C4)	Date	Amount
LUTTERMAN TERESA	2017-06-05	\$500.00
SPIEGEL JOEL	2017-06-05	\$500.00
SPIEGEL JOEL	2017-06-05	\$500.00
FAIRMAN FLEUR	2017-06-02	\$1,000.00
FAIRMAN FLEUR	2017-06-02	\$1,000.00
GREEN KERSTEN	2017-06-02	\$1,000.00
BERK BONNIE	2017-06-02	\$250.00
CLOUGH VIRGINIA	2017-06-02	\$250.00
FERNANDO ANUSHA	2017-06-02	\$250.00
GOULD MEREDITH	2017-06-02	\$250.00
HELLEBUST KENT	2017-06-02	\$250.00
SWANSON CATHERINE	2017-06-02	\$250.00
APPEL SCOTT	2017-06-02	\$125.00
BURKE MAURA	2017-06-02	\$125.00
BUTTE UZMA	2017-06-01	\$1,000.00
BROWN RODNEY	2017-05-05	\$1,000.00
CROOKS JOAN	2017-05-05	\$1,000.00
MITCHELL JULIE	2017-05-05	\$1,000.00
GOLDMAN PETER	2017-05-05	\$750.00
KONGSGAARD MARTHA	2017-05-05	\$750.00
DONNELLY WILLIAM	2017-05-05	\$500.00
GANNETT CRAIG	2017-05-05	\$250.00
KELLEY BECKY	2017-05-05	\$250.00
MALLEY KATHY	2017-05-05	\$250.00
MURPHY SHANNON	2017-05-05	\$250.00
QUIGLEY EILEEN	2017-05-05	\$250.00
STANOVSKY WALTER	2017-05-05	\$250.00
SUNDQUIST STEPHEN	2017-05-05	\$250.00
WIENEKE LEAH	2017-05-05	\$250.00

Exhibit D (Pg. 3 of 3) – Unreported Pledges

KRISHNAMURTHY RAVINDRAN	2017-05-05	\$200.00
GREENWOOD ROBERTA	2017-05-04	\$250.00
MORRIS RASHAD	2017-05-04	\$150.00
RASKIN CYNTHIA	2017-05-03	\$1,000.00
RASKIN CYNTHIA	2017-05-03	\$1,000.00
RASKIN RICHARD	2017-05-03	\$1,000.00
LUNDQUIST LORAIN	2017-05-03	\$500.00
DURSO LAURA	2017-05-03	\$250.00
MOGUL KEN	2017-05-03	\$250.00
BAGLEY CHARLES	2017-05-02	\$1,000.00
CHAMBERLAIN NANCY	2017-05-02	\$1,000.00
CHEN SHARON	2017-05-02	\$1,000.00
GILBERT STEVEN	2017-05-02	\$500.00
KARP SUSAN	2017-05-02	\$500.00
MARTINEZ KRISTIN	2017-05-02	\$500.00
RITZENTHALER NANCY	2017-05-02	\$500.00
VOGET RICHARD	2017-05-02	\$500.00
TRAISMAN CLIFFORD	2017-05-02	\$250.00
BALAKRISHNAN MALINI	2017-05-01	\$250.00
BRECKENRIDGE PAMELA	2017-04-05	\$200.00
CHANA HARMINDER	2017-04-03	\$500.00
MORENCY MARGARET	2017-04-01	\$250.00
RAMALEY ALAN	2017-04-01	\$250.00
LAUDER LAURA	2017-03-02	\$1,000.00
STEWART MIMI	2017-03-02	\$250.00
DAVE ALPA	2017-03-01	\$250.00
HARTUNG JAMIE	2017-03-01	\$250.00
THORSOS ERIC	2017-03-01	\$125.00
THORSOS K TERRY	2017-03-01	\$125.00
GULERIA JAIRAJ	2017-02-05	\$1,000.00
GULERIA JAIRAJ	2017-02-05	\$1,000.00
GULERIA PAWANJIT	2017-02-05	\$1,000.00
GULERIA PAWANJIT	2017-02-05	\$1,000.00
SINGH BIBAN	2017-02-04	\$1,000.00
SINGH BIBAN	2017-02-04	\$1,000.00
SINGH J.J.	2017-02-04	\$1,000.00
SINGH J.J.	2017-02-04	\$1,000.00

Exhibit E -- Dhingra's illegal Refusal to setup appointment

From: **Glen Morgan** <glenmorgan89@gmail.com>
Date: Fri, Jun 16, 2017 at 11:02 AM
Subject: Request to inspect your campaign books
To: mankad@hotmail.com, treasurer@andy-lo.com, manka@electmanka.com, info@electmanka.com

Hello Manka --

I hope this e-mail finds you well.

In advance of the primary election, I was hoping to make an appointment to view your campaign books during the period starting on 7/24/2017 and ending on 8/1/2017.

Because I will be conducting a thorough and hopefully comprehensive audit of your campaign books (to include invoices, receipts, bank statements, cross-referencing of documents, etc.) I expect to need three full days to complete my task. Although my hours will likely be more like 10:00 AM to 6:00 PM on this task, I would like to block out the entire 8:00 AM to 8:00 PM timeframe for the days of 7/24, 7/25, and 7/26 in case I am able to arrive early/leave later.

If I am unable to complete my task during this time, I will schedule appointments for the remaining days.

In an effort to reduce the amount of time spent on the audit, I may bring others to help me to streamline certain tasks for efficiency's sake. If you would allow us to take pictures of the documents, I might be able to get by with only two full days of inspection. which would save time. I can also bring a couple of portable scanners with me (similar to what I use with on-site public records act requests when we have mass document processing to do on site)

Since I see you've updated the address on your C1, should I be going to the Redmond location or the previous Seattle location?

I know we are still a few days out from the primary, but I wanted to make sure this was on your radar to assist in advance planning. Please send me an e-mail with your answer as soon as possible so I know I've sent this to the correct address.

Best Regards,

Glen Morgan

(No response has been received as of 6/26/2017 – Glen)