

o Whom it May Concern –

It has come to my attention that The Eastside Democratic Dinner Committee has violated provisions of RCW 42.17A.

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

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, The Eastside Democratic Dinner Committee failed on numerous occasions to do this.

a) According to the PDC, the C4 for the time period of 1/1/2017 to 1/31/2017 was due on 2/10/2017.

The Eastside Democratic Dinner Committee failed to file an accurate C4 until 3/13/17, **33 days past the statutory deadline.**

b) According to the PDC, the C4 for the time period of 12/1/16 to 12/31/16 was due on 1/10/2016.

The Eastside Democratic Dinner Committee failed to file an accurate C4 until 3/13/17, **63 days past the statutory deadline.**

c) According to the PDC, the C4 for the time period of 11/1/2016 to 11/30/2016 was due on 12/10/2016.

The Eastside Democratic Dinner Committee failed to file an accurate C4 until 3/13/17, **93 days past the statutory deadline.**

d) According to the PDC, the C4 for the time period of 10/18/16 to 10/31/16 was due on 11/1/2016.

The Eastside Democratic Dinner Committee failed to file an accurate C4 until 11/3/16, well past the statutory deadline.

e) According to the PDC, the C3 for the time period of 9/5/16 to 9/11/2016 was due on 9/12/2016.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C3 until 10/17/2016, **35 days past the statutory deadline.**

f) According to the PDC, the C3 for the time period of 9/5/16 to 9/11/2016 was due on 9/12/2016.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate (separate from the above) C3 for this report period until 10/17/2016, **32 days past the statutory deadline.** (See **Report #100727350**).

g) According to the PDC, the C3 for the time period of 9/5/16 to 9/11/2016 was due on 9/12/2016.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate (separate from both of the above) C3 for this report period, until 10/17/2016, **35 days past the statutory deadline.** (See **Report #100727347**)

h) According to the PDC, the C4 for the time period of 7/12/16 to 7/25/16 was due on 7/26/16.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/16, **40 days past the statutory deadline.**

i) According to the PDC, the C4 for the time period of 4/1/16 to 4/31/16 was due on 5/10/16.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/2016, **119 days past the statutory deadline.**

j) According to the PDC, the C4 for the time period of 6/1/2016 to 7/11/2016 was due on 7/12/2016.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/2016, **56 days past the statutory deadline.**

k) According to the PDC, the C4 for the time period of 5/1/2016 to 5/31/2016 was due on 6/10/2016.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/2016, **88 days past the statutory deadline.**

l) According to the PDC, the C4 for the time period of 3/1/16 to 3/31/16 was due on 4/10/16.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/16, **149 days past the statutory deadline.**

m) According to the PDC, the C4 for the time period of 2/1/16 to 2/29/16 was due on 3/10/16.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/16, **180 days past the statutory deadline.**

n) According to the PDC, the C4 for the time period of 1/1/16 to 1/31/16 was due on 2/10/16.

Unfortunately, The Eastside Democratic Dinner Committee failed to file an accurate C4 until 9/6/16, **209 days past the statutory deadline.**

By failing to file this report (they waited nearly 7 months past the deadline), they **effectively hid the \$8000 that their committee donated** to the following committees: 5th LD, 41st LD, 48th LD, and 45th LD Democrats. (See report #100718996).

This is most egregious of all the violations I have identified in this complaint. Failure to timely report these expenditures in a timely manner is unacceptable and not even close to compliance with the law.

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

Washington's campaign finance law requires a campaign to timely report contributions received. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of any individual contributor giving more than \$100 in the aggregate.

Hillary Franz donated \$125 on 9/5/2016 and was identified as "unemployed", however she was Executive Director at Futurewise, an extremist Seattle litigation organization at the time (Ref #100719282)

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

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days. Per **WAC 390-05-295**,

this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

(From 2016)

The Eastside Democratic Dinner Committee illegally failed to report the following debts on preceding C4s:

EMBASSY SUITES -
BELLEVUE 9/9/2016 \$9,000.00 BELLEVUE WA 98008 EVENT ROOM
RENTAL,, FOOD, BEVERAGES

EMBASSY SUITES -
BELLEVUE 10/14/2016 \$3,395.82 BELLEVUE WA 98008 FINAL PAYMENT

These items should have been reported as debt during the reporting period where they reserved the room for the event. They reserved the room months in advance, but failed to report it as debt.

I have reason to believe that these items should have been reported as debt on the C4 covering the time period of May, 2016. A subpoena of the Committee's campaign records should confirm this.

(From 2015)

The Eastside Democratic Dinner Committee also illegally failed to report the following debts on preceding C4s:

METROPOLITAN MARKET CATERING 10/24/2015 \$1,243.66 SEATTLE WA 98109
EVENT FOOD

GRAND EVENT RENTALS 10/20/2015 \$1,093.09 BELLEVUE WA 98005 EVENT
EQUIPMENT RENTAL

CITY OF
BELLEVUE 10/24/2015 \$1,065.00 BELLEVUE WA 98009 HIGHLAND
COMMUNITY CENTER RENTAL

CITY OF
BELLEVUE 10/24/2015 \$500.00 BELLEVUE WA 98009 SECURITY
DEPOSIT

These items should have been reported as debt during the reporting period where they began planning the event and made provisions to engage in these expenditures.

I have reason to believe that these items should have been reported as debt on the C4 covering the time period of June, 2015. A subpoena of the Committee's campaign records should confirm this.

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

The Eastside Democratic Dinner Committee failed to list Rich Erwin (41st LD Chair), Kenneth Albinger (45th LD Chair), and James Terwilliger (48th LD Chair) as officers, which is required by **RCW 42.17A.205(2)(c)**.

The Eastside Democratic Dinner is essentially a fundraiser that splits event proceeds between four separate Dem LDs – 5th, 41st, 45th, 48th. All decisions related to the Committee's activity are made by these 4 chairs.

Martin Cheney (5th LD Chair) is the only one currently listed as an officer on the C1PC form.

The above individuals should have been listed as committee officers, because they, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

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

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

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

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

Despite making all the decisions for the Eastside Democratic Dinner Committee, only one of the four officers are listed on the C1PC. In their roles as officers, these individual doubtlessly made illegal expenditures on behalf of the committee.

The PDC should investigate the possibility that The Eastside Democratic Dinner Committee 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