

## To Whom it May Concern

It has come to my attention that the Clark County Democratic Central Committee has violated numerous provisions of **RCW 42.17A**

### **1) Failure to accurately report debt for caucus meeting locations. (Violation of RCW 42.17A.240(8))**

The Clark County Democrats failed to accurately report debt for when they reserved space for their county/LD level caucuses and the 2016 County Convention. Instead, they reported these expenditures/debts "Teresa Purcell style", i.e. they only reported the expenditure of when they paid the invoice, instead of when they incurred the debt, which was much, much earlier:

Date	Vendor	Amount
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Vancouver Public Schools	\$386.00
2/8/16	Ridgefield School District	\$10.00
2/8/16	Washougal School District	\$5.00
2/11/16	Vancouver Public Schools	\$386.00
2/23/16	La Center School District	\$90.00
3/2/16	Vancouver Public Schools	\$889.00
3/11/16	Washougal School District	\$164.25
3/28/16	Camas School District	\$616.00
3/17/16	Vancouver School District	\$80.00
<b>Total</b>		<b>\$4,942.25</b>

### **2) Accepting overlimit contribution from candidate authorized committees, failure to return over limit contributions within 10 calendar days. (Violation of RCW 42.17A.405, see WAC 39016312)**

Clark County Democrats accepted the following illegal donations from candidate authorized non surplus fund committees: (See **PDC case no. 8928 for further reference - also this was basis for AG lawsuit**)

Date	Candidate Authorized non-surplus fund committee	Amount
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5/16/16	Campaign to elect Alishia Topper	\$850.00*see note
below		
5/26/16	Committee to Elect Sharon Wylie	\$700.00**see note
below		
5/28/16	Annette Cleveland for State	\$700.00***see note
below		
5/28/16	Don Orange	\$700.00****see note
below		
5/31/16	McDevitt for Congress	\$700.00
6/10/16	Elect Tim Probst	\$630.00*****see note
below		
6/29/16	Campaign to Elect Roman Battan	\$700.00*****see note
below		
6/30/16	McDevitt for Congress	\$450.00
12/15/16	Committee to Elect Sharon Wylie	\$500.00*****see note below
12/15/16	Annette Cleveland for State Senator	\$500.00*****see note

**Total \$6,430**

\* Please note, this contribution was erroneously listed as coming from Alishia Topper (C4 ref#100703348), however according to the Committee Campaign to Elect Alishia Topper C4 (C4 ref#100706902) for “Democrat Forward Together Dinner” with a contribution date close to the CCDC.

\*\*Please note, the contribution from the Committee to Elect Sharon Wylie was listed on her C4 (C4 - ref #100699593) for the “Forward Together Dinner” with a contribution date in conflict with the CCDC of 5/12/16.

\*\*\*Please note, the contribution from the Committee Annette Cleveland for State Senator was listed on her C4 (C4-ref#100706271) for “Forward Together Dinner - Table” with a contribution date in conflict with the CCDC of 5/7/16.

\*\*\*\*Please note, the contribution from Don Orange would be legal if this was from him personally, but according to his C4 (C4-ref#100707468) for the “Forward Together Dinner” his campaign paid \$200 with an expenditure date in conflict with the CCDC of 6/13/16. It isn’t clear exactly how much of this expenditure is a violation - and it looks like the CCDC also failed to accurately report the source of this donation.

\*\*\*\*\*Please note, the contribution from Elect Tim Probst was listed on his C4 (C4 ref#100701039) as “annual dinner tickets” with a contribution date in conflict with the CCDC of 5/28/16.

\*\*\*\*\*Please note, this contribution was erroneously listed as coming from Roman Battan (C4 ref#100706124), however according to the Committee Campaign to Elect Roman Battan C4 (C4 ref#100708444) for "Annual Dinner Table Purchase" with a contribution date matching the CCDC.

\*\*\*\*\*Please note, the contribution from the Committee to Elect Sharon Wylie was listed on her C4 (C4 - ref#100736806) for "Contribution to Election Night Party" with a date in conflict the CCDC of 11/07/16.

\*\*\*\*\*Please note the contribution from the Committee Annette Cleveland for State Senator was listed on her C4 (C4-ref#100736398) for "Election Night Party" with a date in conflict with the CCDC of 11/04/16

Additionally, the Clark County Democrats failed to return these illegal overlimit contributions within 10 calendar days, which is also a separate and independent violation.

### **3) Multiple violations of RCW 42.17A.240**

The following details various specific violations of RCW 42.17A.240 which were made by the Clark County Democrats when filing their C3s & C4s (grouped by category of specific type of violation):

#### **Employment Status and Occupation of Contributors**

This C3 (C3-ref#100706114) indicates the CCDCC received a contribution from INSLEE JAY on 6/10/2016 for \$300.00 and it indicates his employer is US HOUSE OF REPRESENTATIVES and his occupation is CONGRESSMAN. He is actually the Governor of Washington State.

The following reports (C3 reports Ref#100703402, Ref #100712671, Ref#100739045, Ref#100739054, Ref#100712672) shows CCDCC received contributions from ROGERS RICHARD and it lists his occupation as RETIRED. Yet, all other reports in the PDC show ROGERS RICHARD show his occupation is SOFTWARE and his employer is CSS/IGI: (C3 reports Ref#100708434, Ref #100725660, Ref#100695555, Ref#100695556, Ref#100689527)

These reports (C3 Ref#100692051, Ref#100721008) show that CCDCC received contributions from COKER IAN and list his occupation as NOT EMPLOYED. Yet this report (C3 Ref#100702025) shows COKER IAN contributed to WA ST DEMO CENT COMM NON EXEMPT and show his occupation as BUSINESS SYSTEMS Specialist and his employer as ALTUS WELL EXPERTS, INC.

These reports (C3 Ref#100703362, C4 Ref#100704510) show CCDCC received contributions from KURAN JACQUELINE and show her employer as VCE, INC and occupation as

ACCOUNTANT. But the following reports show her as “retired” (C3 Ref#100712897, Ref #10012671, Ref#100732711, Ref #100739054, Ref#100741433, Ref#100741340, Ref#100739026). Jackie Kuran as CCDCC treasurer listed her occupation inaccurately in one set of these reports.

These reports (C3 Ref#100712671, Ref#100692001, Ref#100739054, Ref#100739028, Ref#100691992, Ref #100703790, Ref#100712861) show CCDCC received contributions from HARRIS TANISHA that show her occupation as UNEMPLOYED. Yet these reports (Ref #100699328, Ref#100708439, Ref#100701352) show her employer as YWCA CLARK COUNTY and occupation as CASA PROGRAM SPECIALIST.

These reports (C3 Ref#100704058, Ref#100712898) CCDCC received contributions from HEYWOOD MIKE with his employer listed as LUEPKE FLOWERS and his occupation listed as FLOWER DELIVERY. Yet, these reports (Ref#100713403, Ref#100719842, Ref #100730683, Ref#100739055) list his occupation as retired.

These reports (Ref#100703374, Ref#100712671) show CCDCC received contributions from MADUGULA KALA which lists his employers as KALA MADUGULA and his occupations as DENTIST. Yet, this Report (Ref#100730432) shows his employer as ASPEN DENTAL, this Report (Ref#100709127) shows his employers as VANCOUVER CLINIC and his occupation as PSYCHIATRIST, and this report (Ref#100708994) shows his employer as RESEARCHING, and his occupation as RESEARCHING. Who is his employer and what is his occupation?

This Report (Ref#100706086) show the CCDCC received a contribution from MCENERNY-OGLE ANNE on 5/30/2016 for \$150.00 and her occupation is listed as RETIRED. These reports (Ref#100692344, Ref#100717864) show her employer is CITY OF VANCOUVER and her occupation is CITY COUNCIL PERSON.

These reports (Ref#100703421, Ref#100712661) show CCDCC received contributions from ORANGE DON and his occupation as RETIRED. However, these reports (Ref#100722444, Ref#100678804, Ref#100717866) show his employer is HOSELY [ECO] AUTOMOTIVE and his occupation as BUSINESS OWNER or PRESIDENT.

### **Incorrect Total Aggregations**

The CCDCC received a contribution from ELECT MONICA STONIER on 5/19/2016 for \$200.00 for OFFICE SPACE. The aggregated total is **listed as \$400 but should be \$200.00.**

The CCDCC received a contribution from ELECT MONICA STONIER on 6/1/2016 for \$200.00 for 2016 JUNE OFFICE SPACE. The aggregated total is **listed as \$1,050.00. However from the previous report, it appears the aggregated total should be \$600.00.**

The CCDCC received a contribution from ELECT MONICA STONIER on 6/10/2016 for \$250.00. The aggregated total is **listed as \$650.00 but should be \$850.00.**

The CCDCC received a contribution from ELECT MONICA STONIER on 9/2/2016 for \$200.00 for 2016 SEPTEMBER. The aggregated total is **listed as \$1,650.00 but should be \$1,450.00.**

The CCDCC received a contribution from the individual person, STONIER MONICA on 9/23/2016 for \$240.00 with her employer listed as EVERGREEN SCHOOL DIST 114 and her occupation listed as TEACHER. The aggregated total is **listed as \$1,440.00 but should be \$615.00.**

The CCDCC received a contribution from MCDEVITT FOR CONGRESS on 6/10/2016 for \$300.00. The aggregate total is **listed as \$300.00 but should be \$1,275.00.**

The CCDCC received a contribution from MCDEVITT FOR CONGRESS on 6/30/2016 for \$450.00 with an aggregated **total of \$750.00 but should be \$1,725.00.**

The CCDCC received a contribution from WASHINGTON STATE DEMOCRATIC CENTRAL COMM on 7/1/2016 for \$950.00 with an aggregated total of \$2,400.00 but should be \$1,450.00.

#### **Rental Office Space was handled in a very disorganized, and possibly illegal manner**

The PDC website show that CCDCC reported receiving \$200.00 from the CAMPAIGN TO ELECT ROMAN BATTAN on 8/1/2016 for "2016 AUGUST" and \$200.00 for "2016 OCTOBER". \$200 is the same amount for "office space" for one month at CCDCC's Coxley office. However, there does not seem to be a corresponding expenditure in the Campaign to Elect Roman Battan's reports. These contributions listed in CCDCC's reports should probably be expenditures and there should be corresponding contributions listed in Roman Battan's reports (although this complaint is only focused on the CCDCC).

The PDC website show that CCDCC reported receiving \$200.00 from the COMMITTEE TO ELECT ERIC HOLT on 10/1/2016 for "2016 OCTOBER". That is the same amount for "office space" for one month at CCDCC's Coxley office. This contribution listed in CCDCC's reports should probably be an expenditure and there should be a corresponding contribution listed in Eric Holt's reports.

The PDC website show that CCDCC reported receiving \$200.00 from the COMMITTEE TO ELECT JUSTIN OBERG on 10/1/2016 for "2016 OCTOBER". That is the same amount for "office space" for one month at CCDCC's Coxley office. This Contribution should probably be an expenditure.

Kathy Gillespie had a staff member with a desk in the CCDCC offices during at least part of the primary and all of the general election campaign time frame but CCDCC nor Kathy Gillespie's campaign lists the office space on their reports.

Jim Moeller (who ran for CD3 US House Representative) had a staff member with a desk in the CCDCC offices at least part of the primary and all of the general election campaign time frame but CCDCC nor Jim Moeller's campaign lists the office space on their reports. The FEC website shows David McDevitt who ran in the primary for the same position as Jim Moeller paid at least \$750 in rent on 7/16/2016 for CCDCC rent for the primary.

The WA St Demo Cent Comm had a coordinated campaign which had 4 staffers with 2 offices and 4 desks in the CCDCC Coxley office. The staffers were Michael McIntyre (manager), had his own office, Lanie Ferguson (LD17), Jesse Sutherland (LD49), and Adam Johnson (LD18). The latter three shared an office. Yet it does not appear that any of office was reported on either the CCDCC reports or the WA St Demo Cent Comm reports. CCDCC acknowledges the coordinated campaign in some of its expenditures like this Report (Ref#100730685) for CASH AND CARRY items on 10/17/2016 for \$167.50 in VANCOUVER, WA 98662 with a description of 2016 OCT COORDINATED OFFICE.

Raise Up WA, a campaign to support 1-1433, had a staff member, Spencer Trumm, that had a desk in ¼ of a multi-purpose room shared with Tim Probst's campaign. No in-kind contribution is listed either for CCDCC or Raise up WA for this office space.

### **The Question of Fair Market Value:**

How was fair-market value established for the the rental of office space by the CCDCC?

Some candidate's rental of the office space was paid for \$350, \$300.00, \$250. While other candidates got an in-kind value \$200.00 per month for the office space rental. While other campaigns got seemingly free use of their desks/rooms in the shared office space. Some campaigns seemed to get \$200 in-kind contributions for all the months they used the space. While other campaigns seemed to only get the \$200 in-kind contribution for some of the time they used the office space and the rest went unrecorded. And David McDevitt paid CLARK COUNTY CENTRAL COMMITTEE for RENTS on 07/16/2016 for \$750.00 (or \$300.00 on 6/10/2016 and \$450.00 on 6/30/2016, depending on which reports you look at) for an unspecified amount of time.

Tim Probst received an entire office room for his campaign manager, ¾ of a large multi-purpose room dedicated to his campaign, and a desk for a State Senate Democratic Campaign Committee staffer in a room with 3 other campaigns' desks for staffers on different campaigns for \$200 a month. While Monica Stoniers' campaign got a desk for campaign manager in that same room with 3 other staffers/desk for \$200.00.

There was one office room with 4 desk/staffers/campaigns: 1) Sam Kim's Campaign Manager, Chad Davis, 2) State Senate Democratic Campaign Committee staffer, Dan Austreng, who helped Tim Probst campaign the most but also canvassed for Sam Kim & Tanisha Harris 3) Monica Stonier's campaign manager, Sarah Kohout, 4) Jay Inslee's campaign intern, Lily Erikson. It does not look like Sam Kim or State Senate Democratic Campaign Committee, have any record of this in-kind office space.

Jay Inslee's intern, Lily Erikson, started working at the CCDCC Coxley office at or around mid July. How come Inslee's reports shows this money for "RENT" but CCDCC's reports do not show any description? Was this money meant for anything other than office space rental? Patty Murray's staffer, Akua Asare-Konadu, did not start working until August, and never had her own desk or office space. So why did Patty Murray start paying rent June 1, 2016 at the CCDCC Coxley office? And why did Patty Murray's rent drop from \$350 to \$250 with no apparent change in office space use? Was this money meant for anything other than office space rental?

How was the \$200-350 value determined for different office space resources and different campaigns? Is this really fair-market value? Does CCDCC have an explanation for the discrepancies?

The following are helpful reference charts about the CCDCC rent program for 2016

Campaign	Vendor	Date	Amount	Description
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">1/28/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 FEBRUARY</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">5/20/2016</a>	<a href="#">\$200.00</a>	<a href="#">February office spc</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">2/26/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 MARCH LEASE</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">5/20/2016</a>	<a href="#">\$200.00</a>	<a href="#">March office space</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">3/28/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 APRIL</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">5/20/2016</a>	<a href="#">\$200.00</a>	<a href="#">April Office Space</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">5/19/16</a>	<a href="#">\$200.00</a>	<a href="#">April Office Space</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">4/27/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 MAY</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">5/20/2016</a>	<a href="#">\$200.00</a>	<a href="#">May Office Space</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">5/20/2016</a>	<a href="#">\$200.00</a>	<a href="#">May Office Space</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">6/10/2016</a>	<a href="#">\$350.00</a>	<a href="#">May Rent</a>

<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">5/27/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 JUNE</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">6/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">June Office Space</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">6/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">June Office Space</a>
<a href="#">Harris</a>	<a href="#">CCDCC</a>	<a href="#">6/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">June Office Space</a>
<a href="#">Inslee</a>	<a href="#">CCDCC</a>	<a href="#">6/25/2016</a>	<a href="#">\$300.00</a>	<a href="#">June Office Rent</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">7/1/2016</a>	<a href="#">\$350.00</a>	<a href="#">June Rent</a>
WSDCC	CCDCC	n/a	\$0	June Office Space
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">6/8/2016</a>	<a href="#">-\$2,400.00</a>	<a href="#">2016 JULY</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">6/8/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">OFFICE RENTAL</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">7/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">July Office space</a>
<a href="#">Harris</a>	<a href="#">CCDCC</a>	<a href="#">7/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">July Office Space</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">7/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">July Office Space</a>
<a href="#">Inslee</a>	<a href="#">CCDCC</a>	<a href="#">7/26/2016</a>	<a href="#">\$300.00</a>	<a href="#">July Office Rent</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">8/5/2016</a>	<a href="#">\$350.00</a>	<a href="#">July Rent</a>
WSDCC	CCDCC	n/a	\$0	July Office Space

<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">7/28/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 AUGUST</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">8/1/2016</a>	<a href="#">-\$2,400.00</a>	<a href="#">2016 AUGUST</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">8/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">August Office Space</a>
<a href="#">Harris</a>	<a href="#">CCDCC</a>	<a href="#">8/1/16</a>	<a href="#">\$200.00</a>	<a href="#">August Office space</a>
<a href="#">Battan</a>	<a href="#">CCDCC</a>	<a href="#">8/1/2016</a>	<a href="#">+\$200.00</a>	<a href="#">2016 AUGUST</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">8/1/16</a>	<a href="#">+\$200.00</a>	<a href="#">August Office Space</a>
<a href="#">Inslee</a>	<a href="#">CCDCC</a>	<a href="#">7/26/2016</a>	<a href="#">\$300.00</a>	<a href="#">August Office Space</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">8/30/2016</a>	<a href="#">\$350.00</a>	<a href="#">August Rent</a>
Moeller	CCDCC	n/a	\$0	August Office Space
WSDCC	CCDCC	n/a	\$0	August Office Space



Raise Up	CCDCC	n/a	\$0	August Office Space
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">8/29/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 SEPTEMBER</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">8/30/2016</a>	<a href="#">-\$2,400.00</a>	<a href="#">2016 SEPTEMBER</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">9/2/2016</a>	<a href="#">\$200.00</a>	<a href="#">Sept Office Space</a>
<a href="#">Harris</a>	<a href="#">CCDCC</a>	<a href="#">9/2/2016</a>	<a href="#">\$200.00</a>	<a href="#">Sept Office Space</a>
<a href="#">Battan</a>	<a href="#">CCDCC</a>	<a href="#">9/2/2016</a>	<a href="#">\$200.00</a>	<a href="#">2016 SEPTEMBER</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">9/2/2016</a>	<a href="#">\$200.00</a>	<a href="#">Sept Office Space</a>
<a href="#">Inslee</a>	<a href="#">CCDCC</a>	<a href="#">9/21/2016</a>	<a href="#">\$300.00</a>	<a href="#">Sept Office Space</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">9/21/2016</a>	<a href="#">\$250.00</a>	<a href="#">Sept Rent</a>
Moeller	CCDCC	n/a	\$0	Sept Office Space
WSDCC	CCDCC	n/a	\$0	Sept Office Space
Raise Up	CCDCC	n/a	\$0	Sept Office Space

<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">10/18/2016</a>	<a href="#">-\$2,520.00</a>	<a href="#">2016 OCTOBER</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">9/27/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 OCTOBER</a>
<a href="#">Probst</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Harris</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Battan</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Stonier</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Holt</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Oberg</a>	<a href="#">CCDCC</a>	<a href="#">10/1/2016</a>	<a href="#">\$200.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Inslee</a>	<a href="#">CCDCC</a>	<a href="#">10/25/2016</a>	<a href="#">\$300.00</a>	<a href="#">Oct Office Space</a>
<a href="#">Murray</a>	<a href="#">CCDCC</a>	<a href="#">10/27/2016</a>	<a href="#">\$250.00</a>	<a href="#">Oct Rent</a>
Moeller	CCDCC	n/a	\$0	Oct Office Space
WSDCC	CCDCC	n/a	\$0	Oct Office Space
Raise U	CCDCC	n/a	\$0	Oct Office Space

<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">11/2/2016</a>	<a href="#">-\$2,400.00</a>	<a href="#">2016 NOVEMBER</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">10/28/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 NOVEMBER</a>
<a href="#">CCDCC</a>	<a href="#">WPC ORCHARDS LLC</a>	<a href="#">11/28/2016</a>	<a href="#">-\$1,475.00</a>	<a href="#">2016 DECEMBER</a>

**4) Improper personal use of contributions or illegal reimbursement of contributions.  
Multiple examples (Violations of RCW 42.17A.445 & RCW 42.17A.240)**

The following list of expenditures appear to be violations of **RCW 42.17A.445** or **RCW 42.17A.240** based on the lack of description provided:

Date	Recipient of illegal reimbursement	"Description"	Amount
2/24/16	Amazon	Amazon	\$24.99
2/25/16	Staples	Office Supplies	
\$197.29			
3/9/16	Amazon	2016 Caucus	\$24.99
3/10/16	Richard Rogers	2016 Caucus	\$63.96
3/23/16	Daniel Mroz	2016 Caucus	\$80.00
3/25/16	Office Max	2016 Caucus	\$53.14
3/30/16	Richard Rogers	2016 Caucus	
\$128.32			
3/30/16	Richard Rogers	2016 Caucus	\$95.17
4/18/16	Tanisha Harris	2016 Caucus	
Reimbursement	\$198.48		
6/9/16	Steven Kuyatt	2016 Annual Dinner	\$132.71
6/15/16	Lakshimidas Undurti	2016 Annual Dinner	
\$1,000.00			
6/16/16	Linda Romero	2016 Annual Dinner	
\$100.00			
7/7/16	Amazon	Office	\$97.57
7/13/16	Staples	Supplies for Office	\$97.54
7/22/16	Uline	Supplies	\$94.99
7/29/16	Jane Strum	Reimburse Office Supplies	
\$243.55			
8/02/16	Amazon	2016 August	\$91.05
8/04/16	Staples	2016 Coordinated Offices	
\$332.11			
8/08/16	Staples	2016 August	\$37.98
8/18/16	Staples	2016 August	
\$109.18			

9/08/16	Staples	Supplies	
\$262.28			
9/15/16	Hampton Inn and Suites	2016 September	
\$325.00			
9/15/16	Hampton Inn and Suites	2016 September	\$60.00
9/16/16	Vancouver's Farmers Market	2016 September	
\$260.00			
9/19/16	Amazon	2016 September	\$98.63
10/26/16	Staples	2016 October Supplies	\$116.17
11/13/16	Murder Mystery Theatre	2016 November	\$83.65
11/13/16	Warehouse 23	2016 November	\$2278.57
11/17/16	Battleground Community Center	2016 November	\$340.00
11/22/16	Battleground Community Center	2016 November	\$60.00
11/23/16	Jo Foody Catering	2016 November	\$255.35
11/30/16	Warehouse 23	2016 November	\$598.37
12/1/16	Guenivere White	Reimbursement	
\$202.67			
12/20/16	Staples	2016 December	\$94.21
12/27/16	Dell Computers	2016 December	\$1,111.09
12/29/16	Amazon	2016 December	\$292.63
12/29/16	Amazon	2016 December	\$88.55
12/29/16	Southwest Office Systems	2016 December	\$490.96
12/29/16	Amazon	2016 December	\$44.29

As indicated above, some of these expenditures clearly lack the descriptions as required by **RCW 42.17A.240**. Some are also possible violations of **RCW 42.17A.445** when they involve questionable personal reimbursements.

I urge the PDC to investigate these allegations immediately. The CCDCC must be required to amend their inaccurate C3 & C4 forms immediately in order to become compliant with the law.

Best Regards,

Glen Morgan



