

10-28-16 Letter to Members of the PDC re Friends of Jimmy

Anderson, Cindy (Perkins Coie) reported 4 days ago (Fri, 28 Oct at 3:27 PM) via Email

To: "pdc@pdc wa gov" <pdc@pdc.wa.gov>

Cc: khamilton@perkinscoie.com

Please see the attached letter from Kevin J. Hamilton, on behalf of the Washington State Democratic Central Committee.

Cindy

Cindy Anderson | Perkins Coie LLP

LEGAL STAFF SUPERVISOR

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E. CAnderson@perkinscoie.com

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

1 Attachment

PDF

[2016-10-28 L...](#)

(1.27 MB)

October 28, 2016

Kevin J. Hamilton
KHamilton@perkinscoie.com
D +1.206.359.8741
F +1.206.359.9741

VIA E-MAIL TRANSMISSION AND U.S. MAIL
pdc@pdc.wa.gov

Public Disclosure Commission
711 Capitol Way #206
P.O. Box 40908
Olympia, WA 98504-0908

Dear Members of the Public Disclosure Commission:

We represent the Washington State Democratic Central Committee (“Washington Democrats”). This letter constitutes a complaint regarding multiple apparent violations of Chapter 42.17A by (1) Friends of Jimmy, (2) We want to be friends of Jimmy, too, and (3) the Manager of these committees, Glen Morgan.

A. Background and Alleged Violations

On August 31, 2016, according to C1 reports filed with the PDC, Glen Morgan set up both Friends of Jimmy and We want to be Friends of Jimmy, too (“Jimmy Too”). *See* Exhibits 1 and 2. Both political committees list the same address and phone number. Mr. Morgan is the only officer identified.

To date, Friends of Jimmy has reported receipt of only one contribution—a \$2,300 contribution from Jimmy Too made on October 12, 2016. *See* Exhibit 3. As further described below, this contribution was then used to fund two robocalls sent to Thurston County residents regarding Jim Cooper, a Democratic candidate for the Thurston County Commission. Having transferred the contributions it received to Friends of Jimmy, Jimmy Too has not made any expenditures itself.

The two sets of robocalls were crafted to mislead voters as to their origins. At least one of the calls indicated that it was sent from the primary phone number for the Thurston County Democrats. The Thurston County Democrats did not approve or endorse this robocall and did not authorize Mr. Morgan to use its phone number for this or any other purpose.

1. Violation of RCW 42.17A.442 and RCW 42.17A.435

Prior to making this contribution, Jimmy Too had not—according to its C3 reports—received contributions of ten dollars or more from at least ten registered voters. Rather, it has reported receiving the following contributions:

Date	Contributor	Amount
9/1/16	Unidentified	\$5
9/6/16	Dream Weavers Inc.	\$1,000
9/6/16	Gene Weaver	\$500
9/6/16	Janet Weaver	\$500
9/13/16	Kevin J. O’Sullivan	\$100
9/13/16	Pat Tarzwell	\$100
9/27/16	Terry Ballard	\$100
Total		\$2,305

See Exhibits 4-8. Jimmy Too has not reported receipt of any contributions after September 27. Thus, as of the date of this letter, Jimmy Too has reported receiving five contributions from individuals in an amount exceeding \$10. On October 12, Jimmy Too transferred *all* of these contributions (with the exception of the \$5 contribution from an unidentified source) to Friends of Jimmy. See Exhibit 3.

Per RCW 42.17A.442, “a political committee may make a contribution to another political committee *only* when the contributing political committee has received contributions of ten dollars or more each from at least ten persons registered to vote in Washington state.” (emphasis added). Jimmy Too has not reported receiving the requisite number of contributions and thus is not authorized to make contributions to other political committees.

Moreover, this contribution violates RCW 42.17A.435, which provides in relevant part that “[n]o contribution shall be made and no expenditure shall be incurred, directly or indirectly, . . . by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.” It is apparent

that Mr. Morgan established a “two committee structure” so as to obfuscate the true source of the contributions used to fund the robocalls in question. Simply put, there is no other conceivable reason why the same person would create two political committees on the same day, channel all contributions to one, then transfer all funds to the second committee to make expenditures.

2. Violation of RCW 42.17A.335

On October 21 and 24, Friends of Jimmy placed robocalls opposing Jim Cooper. See Exhibits 9-10. In addition to the steps to obfuscate the identities of the contributors funding the robocalls, Mr. Morgan and Friends of Jimmy designed the robocalls to mislead voters as to the origin of the calls.

When a person establishes an automated call, he or she can designate the “callback” number that will appear to persons receiving the call. At least one of the robocalls made by Friends of Jimmy indicated that it was sent from the phone number 360-956-0235. This is *not* the number for Friends of Jimmy.¹ Rather, it is the phone number for the *Thurston County Democrats*. See, e.g., <http://www.thurstondemocrats.org/contact>. In short, Mr. Morgan and Friends of Jimmy purposefully attempted to create the impression that the Thurston County Democrats generated and endorsed a robocall smearing a Democratic candidate.

RCW 42.17A.335 prohibits a person from sponsoring “with actual malice a statement constituting libel or defamation per se,” including “[p]olitical advertising or an electioneering communication that makes either directly or indirectly, a false claim stating or implying the support or endorsement of any person or organization.” Here, by using the Thurston County Democratic Party’s phone number without authorization, Friends of Jimmy falsely implies the Party’s support for and endorsement of the content of the robocall.

By way of this letter, I am requesting that the Commission review and take action with regard to these violations as expeditiously as possible. Please do not hesitate to contact me if I can provide any further information.

Very truly yours,

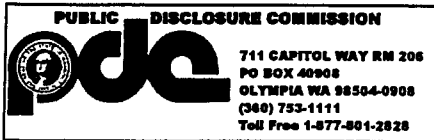


Kevin J. Hamilton

KJH

¹ Friends of Jimmy identified its phone number as 360-791-6556 in its C1 report. See Exhibit 1.

Exhibit 1



711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111
Toll Free 1-877-801-2828

Political Committee Registration

C1PC

(1/12)

SEP 22 2016

Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.)

Friends of Jimmy

Acronym:

Telephone: (360) 791-6556

Mailing Address

1001 Cooper Pt. Rd. SW #140-222

Fax: ()

City Olympia County Thurston Zip + 4 98502

E-mail: glenmorgan89@gmail.com

NEW OR AMENDED REGISTRATION?
 NEW. Complete entire form.
 AMENDS previous report. Complete entire form.

COMMITTEE STATUS
 Continuing (On-going; not established in anticipation of any particular campaign election.)
 election year only. Date of general or special election: _____ (Year)

1. What is the purpose or description of the committee?
 Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.

Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: _____ Ballot Number FOR AGAINST

Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:

For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? Yes No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? Yes No If yes, identify the party: Jim Cooper

2. Related or affiliated committees. List name, address and relationship. Continued on attached sheet.

3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.)
If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options.
 MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.
 FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.

4. Campaign Manager's or Media Contact's Name and Address
Glen Morgan, 1001 Cooper Pt. Rd. SW #140-222
Olympia, WA 98502

Telephone Number: (360) 791-6556

5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes No See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. Continued on attached sheet.

Daytime Telephone Number: (253) 630-5296

ORIN R. WELLS 2611 I St. NE #197 Auburn, WA 98002

6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. Continued on attached sheet.

7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." Continued on attached sheet.
Glen Morgan - Manager
1001 Cooper Pt. Rd. SW #140-222
Olympia, WA 98502

8. Campaign Bank or Depository
Washington State Employees Credit Union Branch Tumwater City Tumwater

9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.
Street Address, Room Number, City where campaign books will be available for inspection
101 Auburn Way S, Auburn, WA 98002
In order to make an appointment, contact the campaign at (telephone, fax, e-mail): (253) 630-5296

10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

Committee Treasurer's Signature Orin R. Wells Date 8/31/2016

Exhibit 2

Exhibit 3

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100729554

10-23-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Friends of Jimmy

Mailing Address
 1001 Cooper Pt. Rd. SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/12/16	WE WANT TO BE FRIENDS OF JIMMY 1001 Cooper Pt. Rd. SW Olympia, WA 98502				2,300.00	2,300.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			2,300.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

2,300.00

4. Date of Deposit
 10/12/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature
 Orin R Wells

Date
 10-23-2016

Exhibit 4

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100720234

09-12-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 We Want To Be Friends of Jimmy Too

Mailing Address
 1001 Cooper Pt. Rd SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/06/16	DREAM WEAVERS INC 9917 HWY 12 SW Rochester, WA 98579				1,000.00	1,000.00
		Occupation				
09/06/16	GENE WEAVER 12007 170th Ave SW Rochester, WA 98579	Retired			500.00	500.00
		Occupation				
09/06/16	JANET WEAVER 12007 170th Ave SW Rochester, WA 98579	Retired			500.00	500.00
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			2,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

2,000.00

4. Date of Deposit
 09/06/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Orin R Wells Date: 09-12-2016

Exhibit 5

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100721982

09-19-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 We Want To Be Friends of Jimmy Too

Mailing Address
 1001 Cooper Pt. Rd SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/01/16	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>1</u> (persons)	5.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			5.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

5.00

4. Date of Deposit
 09/01/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature
 Orin R Wells

Date
 09-19-2016

Exhibit 6

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100721982

09-19-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 We Want To Be Friends of Jimmy Too

Mailing Address
 1001 Cooper Pt. Rd SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/01/16	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>1</u> (persons)	5.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			5.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

5.00

4. Date of Deposit
 09/01/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Orin R Wells Date: 09-19-2016

Exhibit 7

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100721983

09-19-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 We Want To Be Friends of Jimmy Too

Mailing Address
 1001 Cooper Pt. Rd SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/13/16	KEVIN J O'SULLIVAN 1105 Union Mills Rd. SE Olympia, WA 98503				100.00	100.00
		Occupation				
09/13/16	PAT TARZWELL 51 East Ann Arbor Dr Shelton, WA 98584				100.00	100.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			200.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

200.00

4. Date of Deposit
 09/13/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Orin R Wells Date: 09-19-2016

Exhibit 8

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE

100725933

10-12-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)
 We Want To Be Friends of Jimmy Too

Mailing Address
 1001 Cooper Pt. Rd SW #140-222

City Olympia, WA Zip + 4 98502 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
09/27/16	TERRY BALLARD PO Box 5961 Lacey, WA 98509				100.00	100.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			100.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

100.00

4. Date of Deposit
 09/27/16

Treasurer's Daytime Telephone No.: (253) 630-5296

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature
 Orin R Wells

Date
 10-12-2016

Exhibit 9



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — **\$1,000 or more**
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor: FRIENDS OF JIMMY PAC 1001 COOPER PT. RD. SW #140-222 OLYMPIA, WA 98502	E-mail
	GLENMORGAN89@GMAIL.
	Telephone
	360-791-6556

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/21/16	10/22/16	DIALING SERVICES, LLC 8 RIVERSIDE DR. ROSWELL, NM 88201	ROBO CALLS	832.08

Expenditures \$100 or less not itemized above \$ 0.00

Total this report \$ 832.08

Amount or Value
 *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.
 Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports. \$ 832.08

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
COOPER, JAMES (JIM)	COUNTY COMMISSIONER/THURSTO CO	DEMOCRAT	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 832.08	\$ 0.00
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Filer Name:

4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **X** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
TOTAL FUNDS RECEIVED			\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication	
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature _____ Printed Name ORIN R. WELLS
	Street address 3611 I ST. NE UNIT 197
	City/State/Zip AUBURN WA 98002
	Date Signed 10/24/16 Place Signed (city and county) AUBURN KING
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

Exhibit 10



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — **\$1,000 or more**
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — **\$1,000 or more**

1. Name and complete postal mailing address of sponsor: FRIENDS OF JIMMY PAC 1001 COOPER PT. RD. SW #140-222 OLYMPIA, WA 98502	E-mail
	GLENMORGAN89@GMAIL.
	Telephone
	360-791-6556

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/24/16	10/25/16	DIALING SERVICES, LLC 8 RIVERSIDE DR. ROSWELL, NM 88201	ROBO CALLS	1,015.22

Expenditures \$100 or less not itemized above \$ 0.00

Amount or Value		Total this report	\$ 1,015.22
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.		Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 1,847.30

3. List of candidate(s) or ballot proposition(s) identified in the advertising.				Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose		
COOPER, JAMES (JIM)	COUNTY COMMISSIONER/THURSTO CO	DEMOCRAT	<input type="checkbox"/> <input checked="" type="checkbox"/>	\$ 1,015.22	\$ 1,847.30
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Filer Name:

4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:

- a) ___ An individual using only personal funds.
- b) ___ An individual using personal funds and/or funds received from others.
- c) ___ A business, union, group, association, organization, or other person using only general treasury funds.
- d) ___ A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e) **X** A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f) ___ A political committee filing C-5 reports. (RCW 42.17A.250)
- g) ___ Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
TOTAL FUNDS RECEIVED			\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature Printed Name ORIN R. WELLS	
	Street address 3611 I ST NE UNIT 197	
	City/State/Zip AUBURN WA 98002	
	Date Signed 10/25/16	Place Signed (city and county) AUBURN KING
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	