

Complaint Description

File a Formal Complaint - Cheryl Aichele

Cherylrenee143 (Fri, 7 Dec 2018 at 9:41 AM)

Dear Clark County Democratic Central Committee Executives:

We would like to remain anonymous in bringing these concerns forward.

There appears to be numerous PDC violation in 2016-17 by Clark County Democratic Central Committee (CCDCC).

A Profit and Loss (P&L) document for 2016 that CCDCC Treasurer Kuran shared with the CCDCC Executive Committee at the beginning of 2017 does not appear to match corresponding PDC reports. There appears to be at least 1 missing CCDCC contribution from Patty Murray on CCDCC PDC reports. CCDCC has numerous delayed deposits. CCDCC also appears to have at least one more employment status and occupation error. It also appears that CCDCC allowed earmarked money to be funnelled through their bona fide political committee to Democratic candidates. They also appeared to have accepted contributions from candidate committees for more than the cost of the goods. It also appears they did in-kind fundraisers for a couple of candidates that they never reported to the PDC. CCDCC also held a partisan meeting at the City of Vancouver's Water Resource Education center. CCDCC also gave in-kind office space to Don Orange but never report it. Finally, CCDCC appears to have inaccurate/inadequate purposes listed for some of their expenditures.

Many of these violations were never approved by the voting members of CCDCC. Nor was much of this ever disclosed to the voting members. It appears that some CCDCC executives are not only concealing financial information from the Washington state public at large but also the voting members of their own organization. It is difficult for voting members to work with Chair Rogers and Treasurer Kuran to get financial information. Voting members who wanted to sit on finance committees have been denied the opportunity. No financial audit for 2015-16 has been done as the bylaws require. The combination of all of this is worrisome. Voting members who have raised questions or concerns about CCDCC's finances were mistreated and labeled "troublemakers".

If violations are proven, please hold only the executives responsible for these violations accountable, not the entire organization because we had no votes in these matters and found it difficult to address with current leadership. We need outside confirmation that these are violations because leadership is telling us that these things are legal and "everyone is doing it", etc.

ALLEGED VIOLATIONS

RCW 42.17A.230(3) for **failure to timely deposit contributions and file contribution reports**

RCW 42.17A.230(4)(b)(c) **failure to report Fundraising activity according with provisions of this section**

RCW 42.17A.230(6)(a)(b) **failure to report Fundraising activity according with provisions of this section**

RCW 42.17A.240(2)(b) **failure to disclose fundraising income accurately**

RCW 42.17A.240(2)(c) failure to adequately record and aggregate contributors of small contribution for buttons, signs, t shirts

RCW 42.17A.240(4) failure to disclose all other contributions not otherwise listed or exempted

RCW 42.17A.235(4)(a) failure to maintain the books with 1-5 business days

WAC 390-16-034 failure to disclose occupation and employer

RCW 42.17A.240(6) failure to disclose accurately purpose of each expenditures

RCW 42.17A.430(8) receiving funds from candidate committees

RCW 42.17A.270 failure to properly report receiving contributions earmarked for candidates

RCW 42.17A.460 failure to report and attribute earmarked contributions adequately or accurately

WAC 390-17-015 (2) acted as a conduit and transferred contributions on behalf of another

WAC 390-16-037 failure to report purpose of campaign expenditures

RCW 42.17A.555 misuse of public agency facilities in campaigns

P&L Does Not Match PDC

Attached is a copy of a Profits and Loss (P&L) report that the Clark County Democratic Central Committee (CCDCC) Treasurer, Jacqueline Kuran, sent to the CCDCC Executive Committee in March 2017. The P&L has over 45 incidences of discrepancies compared to the Public Disclosure Commission (PDC) reports.

The total income from the P&L is \$115,099.95. Whereas total raised on the PDC website for 2016 reads \$134,165.00. Why is there a \$19,065.05 difference in these two amounts. The total expense from P&L is \$121,139.34. Whereas, the total spent on the PDC website reads \$119,086.93. What accounts for this \$2,082.41 difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/contributions?param=Q0xBUkRDIDY2Ng====&year=2016&type=party_county

This P&L lists item #4000-00-1001 as income from buttons for \$222.00. There is no expense listed in the P&L nor the PDC that shows an expense or income for buttons or button materials. How were the buttons or button supplies/materials purchased? Did someone, like Marsha Manning and/or Liz Campbell, donate the expense of the buttons? If so, is there in-kind contributions listed for the expense of these buttons on any PDC report? How did they track who gave money for buttons? Please see attached photo of buttons being sold at the CCDCC Coxley office with notes that says "BUTTON DONATIONS" and "ALL DONATIONS GO TO CANDIDATE FUND". Which candidates were given money from the candidate fund? Who made the decision to give that money to which candidates?

At the August 18, 2017 CCDCC meeting at Innovative Solutions in Vancouver, Candy Bonneville handed Jackie Kuran a plastic bag full of coins and bills. Bonneville said the bag contained \$519 from selling buttons at the CCDCC booth at the Clark County Fair. Bonneville said that Marsha Manning and Liz Campbell supplied the buttons for sale. It does not appear this \$519 for buttons was reported to the PDC nor does it appear there were any expenses or in-kind contributions for buttons reported to the PDC.

This P&L lists item #4000-00-1002 as income from signs for \$1,453.41. What signs? Hillary Clinton signs? There is no sign expense listed in the P&L nor does the PDC show an expense or income for signs. On February 22, 2017, during the 17th Legislative District Democratic Central Committee (the 17th LD Democrats) meeting, CCDCC Treasurer Kuran

told the 17th LD Democrats not to purchase signs out right. Terri Niles, a member of both LD17 Dems and CCDCC was proposing LD17 Dems buy signs to sell for fundraising. CCDCC Treasurer Kuran advised not to because then it would have to be reported to the PDC. Kuran suggested that someone else should purchase the signs and donate the money made from selling the signs to the 17th LD Democrats. Kuran explained how Marsha Manning and Liz Campbell had purchased Hillary Clinton signs during the 2016 general election cycle. Kuran explained how these ladies left the signs at the CCDCC Coxley office with a \$10 sales/donation cost for each. Then these ladies donated that money earned from the sign sales to CCDCC. That way Kuran didn't have to write a PDC report for purchasing the signs or for each individual who bought a sign, only receiving the donations from Liz Campbell and Marsha Manning. Was an in-kind contribution reported for the original purchase of the signs? How did they track who gave money for signs?

This P&L lists item #4000-00-1020 as income from SW Labor Dinner for \$2,550.00. Whereas, PDC shows 5 expenditures Southwest Washington Central Labor Council for \$480.00 each for 2016 September Dinner 8/23/16-9/20/16 for a total of \$2,400.00 spent but the PDC does not show any income from this.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771619>

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771620>

SW WASHINGTON CENTRAL LABOR COUNCIL did donate \$700 to CCDCC on 6/29/16.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100706122>

This P&L lists item #4000-00-2001 as income from Cor Office for \$10,250.00. What makes up this income? Rent? How does this income appear on PDC?

This P&L lists item #4097-00-6001 as income from Low Fundraiser for \$0.00. Whereas, PDC shows \$6,028.18 for Proceeds from Low Cost Fundraiser. Why is there a difference between these 2 documents for this item?

<http://web.pdc.wa.gov/MvcQuerySystem/AdvancedSearch/ContributionsData?page=1&orderBy=~&groupBy=~&filter=contributor~substringof~%27low%20cost%27&contributee=Q0xBUkRDIDY2Ng====&electionYear=2016&committeeType=IGNORE&election=ALL>

This P&L lists item #4099-00-100 as income from Anonymous Contribution for \$0.00.

Whereas, PDC lists anonymous contributions as \$2,083.00. What makes up the difference between these two figures on these two documents?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/contributions?param=Q0xBUkRDIDY2Ng====&year=2016&type=party_county

This P&L lists In-Kind Donations as \$4,537.85. Whereas, PDC lists in-kind contributions as \$500.82 with a difference of \$4,037.03.

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/inkind?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #4100-00-0000 as income from In-Kind Donations-Other for \$437.85.

Whereas, PDC only shows \$500.82 in all other in-kind donations that aren't listed above. What is the \$62.97 difference?

This P&L lists item #5002-00-1010 as Cost of Goods Sold from COGS T-shirts for \$227.64.

Whereas, there are no expense or income from t-shirts listed on the PDC. Yet, this same amount shows up on the 2017 PDC for CCDCC as t-shirt reimbursement to Marsha Manning. So, it appears that CCDCC didn't report 2016 t-shirt expense to the PDC but reported it in their own books and did not report how much they made off t-shirt sales.

2017: <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100786048>

This P&L lists item #502-00-5001 as income from COGS in Kind Din for -\$500.00. What is this? How can the cost of goods sold be a negative?

This P&L lists item #5002-00-7002 as Cost of Goods Sold from COGS InKind Office Stonier for \$1,600.00. Whereas, P&L item #4100-00-7001 shows \$1,200.00 and PDC shows \$1,400.00. Why is there a difference in these numbers?

This P&L lists item #5002-00-7002 as Cost of Goods Sold from COGS InKind Office Probst for \$1,800.00. Whereas, P&L item # 4100-00-7002 shows \$1,600.00 and PDC shows \$1,600.00. Why is there a difference in these numbers?

This P&L lists item #5002-00-7003 as Cost of Goods Sold from COGS InKind Office Harris for \$400.00. Whereas, P&L item # 4100-00-7003 shows \$800.00 and PDC shows \$1,000.00. Why is there a difference in these numbers?

This P&L lists item #5002-00-7004 as expense of Goods Sold from COGS InKind Office Battan for \$200.00. Whereas, P&L item # 4100-00-7004 shows \$400.00 and PDC shows \$600.00. Why is there a difference in these numbers?

This P&L lists item #5000-00-1001 as expense from IQ Checking for \$66.98. Whereas, PDC shows \$110.38. Why is there a difference of \$43.40?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2017&type=party_county

This P&L lists item #5000-00-1009 as expense from Paypal for \$69.92. Whereas, PDC shows \$56.58. Why is there a difference of \$13.34?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5000-00-1010 as expense from Intuit for \$309.93. Whereas, PDC shows \$329.05. Why is there a difference of \$19.12?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5000-00-1012 as expense from Stripe - other for \$15.14. Whereas, PDC shows \$30.35. Why is there a difference of \$15.21?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5000-00-1020 as expense from Marlin Bank for \$0.00. Whereas, PDC shows \$1,700.64. Why is there this difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5000-00-1070 as expense from Bulk Mail for \$225.00. Whereas, PDC shows \$311.12. Why is there a \$86.12 difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5000-00-5000 as expense from Element Dinner for \$1,254.23. Whereas, PDC shows \$1,679.23. Why is there a \$425.00 difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #500-00-5001 as expense from IQ Checking for \$13.80. Whereas, there is not one transaction in the PDC from IQ Credit Union for this amount. Is this multiple transactions that make up this amount? If so, which transactions?

This P&L lists item as expense from #5020-00-1020 SW WA Labor for \$2,380.00. Whereas, PDC says \$2,460.00. Why is there a \$80 difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5030-00-0000 as expense from Contribute to Comm for \$128.25. What Committee was this contributed to? Was it one contribution or multiple? PDC shows \$128.22 to Rich Rogers for 2016 Caucus.

This P&L lists item #5070-00-0000 as expense from City Inspections for \$60.00. How does this appear on the PDC? What city inspections? Battleground Community Center?

This P&L lists item #5070-00-6003 as expense from Rentals for \$1322.70. Whereas, PDC says \$1,322.50 for Hampton Inn and Suites (Sept meeting) \$385.00 and Camas Parks \$937.50 (July meeting).

This P&L lists item #5070-00-1003 as expense from Expense Office Oth.. for \$169.22. What are these expenses? No item on PDC for this exact amount. Was it multiple expenditures?

This P&L lists item #5070-00-3002 as expense from Rentals Caucuses for \$7,561.80. There's only \$3,569.05 for 2016 Caucus Rentals. Why is there a \$3,992.75 difference?

http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/expenditures?param=Q0xBUkRDIDY2Ng%3D%3D%3D%3D&year=2016&type=party_county

This P&L lists item #5070-00-4002 as expense from Rentals Convention for \$1,726.50. There's only one items for 2016 County Convention Rental for \$822.00. Why is there a \$902.50 difference?

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771616>

This P&L lists item #5070-00-1002 as expense from Rental Wine Social for \$837.93. Whereas, there is no item on PDC for this amount. Was it multiple expenditures?

This P&L lists item #5140-00-1005 as expense from Maintenance Office for \$303.97. What are these items?

This P&L lists item #5155-00-0000 as expense from Miscellaneous Fund/Dinner Exp for \$2,328.44. How do these items match up to PDC?

This P&L lists item #5155-00-5007 as expense from Dinner Exp Raffle for \$1,000.00. How does this appear on the PDC?

This P&L lists item #5170-00-1001 as expense from Office Supplies for \$1,523.94. What are these items? How do these items match up with PDC?

This P&L lists item #5170-00-1002 as expense from Office Equipment for \$2,798.81. What are these items? How do these items match up with PDC?

This P&L lists item #5170-00-1010 as expense from Office Printing for \$524.66. What are these items? How do these items match up with PDC?

This P&L lists item #5170-00-2020 as expense from Office Coordinated for \$1,138.78. What are these items? How do these items match up with PDC?

This P&L lists item #5170-00-0000 as expense from Office Supplies - Other for \$97.15. What are these items? How do these items match up with PDC? And why aren't they included with the Expense Office - Ot for \$169.22 in P&L item 5070-00-1003 or P&L item # 5170-00-1001 Office Supplies?

This P&L lists item #5190-00-0000 as expense from Postage/Bulk Mail for \$533.69. How do these items match up with PDC?

USPS 2/26/2016 \$22.05 VANCOUVER WA 98668 POSTAGE AND POSTAGE DUE

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100685134>

USPS 2/1/2016 \$42.00 VANCOUVER WA 98668 LOCK AND KEYS

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100685134>

USPS BULK MAIL 3/3/2016 \$49.00 VANCOUVER WA 98661 SECRETARY ELECTION

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100689984>

USPS 2/22/2016 \$71.42 VANCOUVER WA 98668 BULK MAIL

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100685134>

USPS 2/1/2016 \$105.02 VANCOUVER WA 98668 THE DEMOCRAT MAILING

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100685134>

USPS 12/21/2016 \$170.00 VANCOUVER WA 98668 2017 RENEWAL

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100741511>

USPS 1/13/2016 \$185.00 VANCOUVER WA 98668 2016 ANNUAL RENEWAL

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100678849>

USPS 3/2/2016 \$225.00 VANCOUVER WA 98668 2016 BULK MAIL RENEWAL

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100689984>

POLLOCK GEORGE 1/12/2016 \$14.70 VANCOUVER WA 98661 BULK MAIL

<http://web.pdc.wa.gov/MvcQuerySystem/CommitteeData/showReport?repno=100678849>

REIMBURSEMENTS

For a total of \$884.19. Why is there over a \$350 difference?

This P&L lists item #5210-00-0000 as expense from Professional Services for \$800.00. What services? Where do they show up on the PDC?

This P&L lists item #5220-00-1001 as expense from Lease Coxley Drive for \$20,180.00. Whereas, PDC shows the Coxley office lease amount at \$1,475.00 monthly. That would be \$17,700.00 for a year. Why is there a \$2,480.00 difference.

This P&L lists item #5220-00-2001 as income from Rent Coor Campaign for \$9,600. Whereas, The PDC appears to show the Coordinated office space for \$12,120.00. Why does the PDC show the October rent \$120.00 more than July, August, Sept, and November? The PDC shows the coordinated campaign rent starting in July. However, in May, the PDC shows that the Probst and Stonier campaign got \$200 in-kind office space and that Patty Murray's campaign paid \$350 for "rent". In June, it also shows that the Probst, Stonier, and Harris campaigns got \$200 in-kind office space, the Murray campaign paid \$350 for "rent" and the Inslee campaign paid \$300 for "rent". What office space were these campaigns using if the coordinated campaign office didn't pay rent until July? What office space was the Murray campaign really using during May, June, and July when her staffer wasn't hired until August? What office space was Inslee's campaign really using during June if his intern didn't start until July? Why are the Inslee and Murray campaigns paying different amounts? Why is the Probst campaign getting the same in-kind rent contributions as the Stonier and Harris campaigns when the Probst campaign had use of more office space?

This P&L lists item #5220-00-0000 as expense from Total Rent for \$29,780.00. Whereas, PDC shows \$30,055.00 going to WPC Orchards LLC, the landlord of the Coxley office location. What is the \$275 difference between the P&L and the PDC?

This P&L lists item 5230-00-1001 as expense subscriptions QB \$0: How can CCDCC be using Quickbooks to keep its financial records if they aren't subscribed to Quickbooks? Is someone, like Jackie Kuran, using their own Quickbooks subscription to manage CCDCC financial records? If so, how come there is no in-kind contributions for that?

This P&L lists item #5230-00-1007 as expense from Subscription Time.ly for \$45.00.

Whereas, PDC shows \$54.07. Why is there a difference?

This P&L lists item #5260-00-1010 as expense from Telephone Basic for \$636.40. Whereas, PDC shows \$430.99 going to BasicTalk. What is the \$205.41 difference?

This P&L lists item #6010-00-5000 as expense from Catering Annual Dinner for \$34,307.67. How does this appear on the PDC? We only see 2 catering expenses for May & June of 2016 and they total \$31,745.83. Why is there a \$2,561.84 difference?

This P&L lists item #6010-00-6010 as expense from Catering Wine for \$458.02. How does this appear on the PDC? There is no one expenditure for that exact amount. Is this multiple items?

This P&L lists item #6010-00-7001 as expense from Catering Election Party for \$2,876.94. How does this appear on the PDC?

What are these “undeposited funds” for \$2,758.10 on the P&L? How do they appear on the PDC?

Missing Contribution?

[CLARK COUNTY DEMOCRATS](#) EVENT TICKETS VANCOUVER WA 986 10/07/2016 \$36 from Patty Murray’s campaign.

<http://docquery.fec.gov/cgi-bin/fecimg/?201610280200634391>

Delays In Receiving, Depositing, Or Reporting?

This [Report](#) shows WA EDUCATION ASSN PAC contributed to CLARK COUNTY DEMOCRATIC CENTRAL COMMITTEE on 5/11/2016 for \$1,400.00 FORWARD TOGETHER DINNER 2 TABLES FOR VANCOUVER WEA MEMBERS.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100700731>

This [Report](#) shows it was not recorded until 5/28/2016. Was there a 17-day delay in receiving, depositing, or reporting these funds?

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100703418>

This [Report](#) shows CLEVELAND ANNETTE M contributed to CLARK COUNTY DEMOCRATS on 5/7/2016 for \$700.00 for FORWARD TOGETHER DINNER - TABLE.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706271>

This [Report](#) shows it was not recorded until 5/28/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100703418>

This [Report](#) shows CLEVELAND ANNETTE M contributed to CLARK COUNTY DEMOCRATS on 11/4/2016 for \$500.00 FOR ELECTION NIGHT PARTY.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100736398>

This [Report](#) shows it was not recorded until 12/15/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100741335>

This [Report](#) shows WYLIE SHARON L contributed to CLARK COUNTY DEMOCRATS on 5/12/2016 for \$700.00 for FORWARD TOGETHER DINNER.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100699593>

This [Report](#) shows that it was not recorded until 5/26/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100703403>

This [Report](#) shows WYLIE SHARON L contributed to CLARK COUNTY DEMOCRATS on 11/7/2016 for \$500.00 for CONTRIBUTION TO ELECTION NIGHT PARTY.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100736806>

This [Report](#) shows it was not recorded until 12/15/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100741335>

This [Report](#) shows PROBST TIMOTHY P contributed to CLARK COUNTY DEMOCRATS on 5/28/2016 for \$630.00 for DINNER TICKETS.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100701039>

This [Report](#) shows it wasn't recorded until 6/10/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706111>

This [Report](#) shows KIM GUN-SAM contributed CLARK COUNTY DEMOCRATIC CENTRAL COMMITTEE on 6/8/2016 for \$250.00 for 1/2 PAGE AD - 2016 FORWARD TOGETHER DINNER PROGRAM.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706782>

This [Report](#) it was not recorded until 6/29/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706122>

This [Report](#) shows WA & NORTHERN IDAHO DIST COUNCIL OF LABORERS PAC contributed to CLARK COUNTY DEMOCRATS on 6/13/2016 for \$850.00 for "CONTRIBUTION".

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100749060>

This [Report](#) says it was not recorded until 6/29/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706122>

This [Report](#) shows WA EDUCATION ASSN PAC contributed to CLARK COUNTY DEMOCRATIC CENTRAL COMMITTEE on 5/11/2016 for \$1,400.00 for 2016 FORWARD TOGETHER DINNER 2 TABLES FOR VANCOUVER EA MEMBERS and this [Report](#) shows CLARK CO DEMO CENT COMM NON EXEMPT didn't report the WEA PAC contribution until 5/28/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100700731>

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100703418>

In addition, this [Report](#) shows WA EDUCATION ASSN PAC contributed to CLARK COUNTY DEMOCRATIC CENTRAL COMMITTEE on 5/11/2016 for \$700.00 for 2016 FORWARD TOGETHER DINNER 1 TABLES FOR WEA RIVERSIDE UNISERV COUNCIL MEMBERS.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100700731>

This [Report](#) shows CLARK CO DEMO CENT COMM NON EXEMPT reported the contribution from WEA PAC on 5/28/2016.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100703404>

Employment Status And Occupation Of Contributors?

These reports show CLARK CO DEMO CENT COMM NON EXEMPT received contributions from KIM GUN-SAM and show his employer is WASHINGTON IT CONSULTING and his occupation SELF EMPLOYED.

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100706099>

<http://web.pdc.wa.gov/MvcQuerySystem/CandidateData/showReport?repro=100711578>

Yet these reports show his employer as CLARK COUNTY and his occupation as TECHNOLOGY DIR, DIRECTOR, and CHIEF INFORMATION OFFICER.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100734500>

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100741916>

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100677581>

So, did CCDCC list Sam Kim's occupation purposefully incorrect? Or did Sam Kim give false information?

Earmarked And/Or Funneled Over-the-limit Contribution?

CCDCC contributed \$8,300 to the Tim Probst campaign on 10/12/16. The CCDCC voting members were not told about this contribution, let alone allowed to vote on it. There is no record (meeting minutes) that show that the Executive Committee or the "Target Fund Committee" voted on the contribution. The decision to make this contribution appears to be made by one or more individuals not any official committee of CCDCC or CCDCC as a whole.

We worried that this contribution was an earmarked donation for Tim Probst from the Washington and Northern Idaho District Council of Laborers PAC and the Kennedy Fund, each of which had already maxed out on giving to Tim's campaign and each of which had given to CCDCC within the month prior to the CCDCC contribution to Tim's campaign. CCDCC gave some of the money from WA and Northern Idaho District Council of Laborers PAC & Kennedy Fund to other candidates on the same day (10/12/16).

Roman Batton got \$1,250, Monica Stonier got \$350, Tanisha Harris got \$250 and Tim Probst got the \$8,300 for a total \$10,150 which is the same exact amount CCDCC received from Washington and Northern Idaho District Council of Laborers PAC (\$4,650 9/29) and the Kennedy Fund (\$5,500 9/14) which is set up to help WA Senate races for Democrats. Tim Probst ran as an Independent Democrat for the senate seat in LD17.

None of the CCDCC contribution to any of these candidates were told to the voting members of CCDCC, the voting members never had an opportunity to vote on these contributions, and there is no record of the CCDCC Executive Committee or the "Target Fund Committee" holding a vote to expend this money. This violates the CCDCC Bylaws.

Here's are the PDC reports relevant to this issue:

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771620>

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100730674>

Also the aggregated total for Washington and Northern Idaho District Council of Laborers PAC on this report is inaccurate it should be \$5,550 not \$9,300.

CCDCC Chair Rogers stated "It's news to me that the PDC doesn't allow earmarked contribution" when an Executive member mentioned during an Executive meeting that "earmarking" contributions was illegal.

CCDCC Treasurer Kuran insisted, to a few CCDCC members, that earmarked funds were legal to accept and expend without documentation. She explained that everyone is funnelling earmarked money through bona fide political party organizations including the Clark County Republicans. Kuran also explained that the reason the Clark County Democrats don't report the Clark County Republicans to the PDC is because then the PDC would make them all stop doing it. That doesn't exactly sound legal.

A CCDCC member, Carrie Parks, explained, to several CCDCC members, the reason they give a majority of the designated funds to the specific candidates is because if they didn't they would not see any more money from those donors again. Parks explained that they are careful not to contribute the exact amount to the candidate that the donor gave so that it cannot be detected as funneled money. Parks explained that if a donor ever said they wanted the money to go to a specific candidate she would tell them that they couldn't not accept money for a specific candidate but that they would have to decide how the money would be used. In reality a majority of that money which was originally intended for a specific candidate would go to that specific candidate with no record of any votes being held to distributed the money.

Contributions from Candidate Committees

This report shows that Friends of Bob Ferguson contributed \$100 to CCDCC on 6/29/16 for some unknown purpose. It's our understanding the candidate committees cannot donate to party committees. Is this a violation? The odd thing about this transaction is Bob Ferguson's PDC doesn't show any \$100 contribution going to CCDCC in 2016.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100706122>

This report shows that Adrian Cortes BG City Council contributed \$222.93 to CCDCC on 1/20/16 for some unknown purpose. It's our understanding the candidate committees cannot donate to party committees. Is this a violation? The odd thing about this transaction is that Adrian Cortes's PDC shows no expenditures in 2016.

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100678799>

CCDCC Fundraisers for Candidates not Listed on PDC Reports

On September 12, 2016, the Clark County Democrats hosted a fundraiser for "Tanisha Harris's "bid to replace David Madore and bring some much needed sanity back to Clark County Council". Yet nowhere on CCDCC's or Harris' PDC reports was this fundraiser listed as in-kind contributions.

On July 11th, 2016, the CCDCC hosted a similar fundraising event for Roman Battan. Yet again none of it appears on any PDC reports as in-kind contributions.

On October 27, 2017, the CCDCC hosted another similar fundraising event for Kathy Gillespie and again the in-kind donation is missing from their PDC reports.

Use of public office or agency facilities in campaigns

CCDCC held its November meeting the City of Vancouver's Water Resources Education Center. At that meeting, CCDCC endorsed and congratulated several Democratic candidates. Public resources are not supposed to be used for partisan campaigning.

In-Kind Contributions Not Reported

CCDCC Chair Rogers bragged about how the CCDCC Coxley Office became "Orange Central" during the 2017 elections since they allowed Don Orange's campaign for Vancouver Port Commission to use the office space. None of this was reported to the PDC.

In addition, Legislative District 17, 18, & 49 have used office space at Coxley with no in-kind contributions reported to the PDC. In addition, all of the LD's can use the CCDCC printer and supplies without reporting these in-kind contributions and expenditures.

Inaccurate/Inadequate Purposes of Expenditures

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771616>

This Report shows CCDCC paid \$2,059.60 to Adco Commercial Printing and the purpose is just "printing". Does CCDCC have to provide more information about the purpose beyond just "printing". What was printed? And what was the purpose of that printing?

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771616>

This report shows CCDCC paid Marsha Manning \$227.64 for "reimbursement". What was the purpose of the original expenditure by Marsha Manning? Is this the missing t-shirt expense?

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100771619>

This report shows CCDCC paid Candy Bonneville \$225.52 for "supplies". What is the purpose of these supplies? What was the purpose of the supplies?

EVIDENCE:

- 1.
2. CCDCC P&L for 2016 attached and with CCDCC Executives
- 3.
- 4.
5. Quickbooks and other financial records with CCDCC Treasurer Kuran
- 6.
- 7.
8. PDC reports linked within
- 9.
- 10.
11. FEC reports linked within
- 12.
- 13.
14. Pictures of buttons being sold at CCDCC Coxley office attached. Physical evidence can be found the the CCDCC Coxley office.
- 15.
- 16.
17. CCDCC Meeting Agendas, Minutes, and notes for General and Executive Meetings on their website or with their members
- 18.
- 19.
20. CCDCC Bylaws on their website
- 21.
- 22.
23. CCDCC Emails with Executives and/or members and service providers
- 24.
- 25.
26. CCDCC Facebook posts, private and public showing discussions on these topics with individuals and Facebook
- 27.
- 28.
29. Phone Records with individuals and service providers
- 30.
- 31.
32. Water Resource Center records with the City of Vancouver
- 33.
- 34.
35. Bank records with CCDCC Treasurer Kuran and financial institution
- 36.
- 37.
38. Postmarked items with CCDCC Executives
- 39.

- 40.
41. Receipts for button supplies, signs, and t-shirts with Treasurer Kuran, Marsha Manning, Liz Campbell
- 42.
- 43.
44. Documents regarding expenditures and contributions of buttons, signs, and t-shirts with individuals
- 45.
- 46.
47. Documents, photo, videos, and audio recordings with individuals
- 48.
- 49.
50. PDC records with the PDC
- 51.

WITNESSES:

- 1.
2. Rich Rogers (CCDCC Chair 2016-17)
3.
 -
 - was on the "Target Fund Committee" 2016 & 17
 -
- Liz Campbell (CCDCC Vice Chair 2016)
 -
 - was on the "Target Fund Committee" 2016
 -
- Jacqueline Kuran (CCDCC Treasurer 2016)
 -
 - was on the "Target Fund Committee" 2016 & 17
 -
- Melissa Boles (CCDCC Secretary 2015-16)
 -
 - She should have General, Executive, and Target Fund Committee meeting minutes from 2016
 -
 -
 - was on the "Target Fund Committee" 2016
 -

- Tanisha Harris (CCDCC State Committee Woman 2015-16, CCDCC Vice Chair 2017, and candidate for Clark County Council 2016)
 -
 - was on the “Target Fund Committee” 2016
 -
- Audrey Ann Miller (CCDCC State Committee Woman 2016 after Harris resigned)
 -
 - was on the “Target Fund Committee” 2016
 -
- Roy Valo (CCDCC State Committee Man 2015-16)
 -
 - was on the “Target Fund Committee” 2016
 -
- Candy Bonneville (LD18 Dem Chair & CCDCC Executive Committee Member 2015-16)
- Cathy Golik (LD17 Dem Chair & CCDCC Executive Committee Member 2015-16)
- Catherine Rich (LD49 Dem Chair & CCDCC Executive Committee Member 2015-16)
- Ginger May (Secretary 2017 and on the Target Fund Committee 2017)
- Joe Maldonado (Secretary 2017 after May resigned and on the Target Fund Committee 2017)
- Mandalynn Harbert (CCDCC State Committee Woman and on the Target Fund Committee 2017)
- Justin Oberg (CCDCC State Committee Man and on the Target Fund Committee 2017)
- Ian Coker (LD18 Dem Chair & CCDCC Executive Committee Member 2017)
- Hattie Stigum (LD17 Dem Chair 2017 & CCDCC Executive Committee Member 2017)
- Terah Pitchford (LD17 Dem Chair 2017 after Stigum resigned & Clark County Women Democratic Women’s Treasurer)
- Angela Wilkinson (LD49 Dem Chair & CCDCC Executive Committee Member 2017)
- Jodi Frisina (CCDCC Vice Chair 2017 after Harris resigned and on the Target Fund Committee 2017)
- Rob Frisina (CCDCC Executive Committee Member 2017)
- Pete Aller (CCDCC Executive Committee Member 2017)
- Andrew Hill (CCDCC Executive Committee Member 2017)
- Gwen White (CCDCC Executive Committee Member 2017)
- Monica Stonier (LD49 State Representative 2016-17)
- Tim Probst (LD17 State Senate Candidate 2016)
- Roman Battan (Clark County Council Candidate 2016)
- Jane Strum (CCDCC Office manager)
- Tom Lineham (CCDCC Office workers)
- Lou Martinee (CCDCC Office workers)
- Donna Quesnell (CCDCC Office workers)

- Any other CCDCC office workers
- Anyone at the CCDCC meetings in 2016 & 2017
- CCDCC Contributors and vendors in 2016 & 2017

Please bring our concerns to the voting members and resolves these issues as soon as possible. We want these concerns fully investigated and we want a full audit of the CCDCC finances for the last 5 years to makes sure there are no further undocumented PDC violations.

We certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of our knowledge and belief.

Sincerely,
 Concerned members of the Clark County Democrats

What impact does the alleged violation(s) have on the public?

The voting members didn't even have this information and we cannot make informed decisions without all the information.

List of attached evidence or contact information where evidence may be found.

See complaint

List of potential witnesses with contact information to reach them.

See complaint

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.