

## Complaint Description

### File a Formal Complaint - Cheryl Aichele

Cherylrenee143 (Fri, 7 Dec 2018 at 9:27 AM)

#### Complain against the 17th Legislative District Democratic Central Committee

##### **Complaint and Background:**

Please do a full audit on 17th Legislative District Democratic Central Committee for 2015-16. There appear to be multiple violations of Campaign Disclosure and Contribution (chapter 42.17A) Revised Codes of Washington.

**17th LD Democratic Chair:** Cathy Golick

**17th LD Democratic Treasurer:** Erich Orth

**17th LD Democratic Board Member:** Marsha Manning

**17th LD Democratic Board Member:** Pete Aller

**Signer on the bank account:** Tanisha Harris

**RCW 42.17A.425 VIOLATIONS?**

**RCW 42.17A.205(4) VIOLATIONS?**

The only person listed, [in section 7, on this Political Committee Registration PDC form](#) as a Committee Officer and other person who authorizes expenditures or makes decisions for the committee is Richard McCluskey, [former] Vice Chair. No other person was authorized to make expenditures in 2015 & 2016. Richard McCluskey did not authorize or make any of the expenditures listed for the 17th Legislative District Democratic Central Committee in 2015 or 2016.

The members of the 2015-16 Executive board nor the signer on the bank account of the 17th LD Democratic Central Committee ever disclosed to its voting members the receipt of the following contributions at any of its monthly meetings.

#### **17th LD Democratic Central Committee (Undisclosed) Contribution**

<b>PAC, Union, Corps and other entries</b>	<b>Date</b>
<a href="#">SEIU HEALTHCARE, 1199 NW</a>	<a href="#">10/24/2016</a>
<a href="#">WASHINGTON FEDERATION OF STATE EMPLOYEES SSF</a>	<a href="#">10/17/2016</a>
<a href="#">HARRY TRUMAN FUND</a>	<a href="#">10/15/2016</a>
<a href="#">JUSTICE FOR ALL PAC</a>	<a href="#">10/15/2016</a>
<a href="#">SEIU 775 QUALITY CARE COMMITTEE</a>	<a href="#">10/15/2016</a>
<a href="#">WASHINGTON &amp; NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC</a>	<a href="#">10/15/2016</a>
<a href="#">KENNEDY FUND</a>	<a href="#">9/28/2016</a>

<a href="#">JEFFERSON COUNTY DEMOCRATS CENTRAL COMMITTEE</a>	<a href="#">9/8/2016</a>	<a href="#">\$1,000.00</a>
<a href="#">JEFFERSON COUNTY DEMOCRATS CENTRAL COMMITTEE</a>	<a href="#">7/21/2016</a>	<a href="#">\$1,000.00</a>
<a href="#">WASHINGTON &amp; NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC</a>	<a href="#">3/23/2016</a>	<a href="#">\$5,000.00</a>
<b>TOTAL</b>	<b>2016</b>	<b>\$39,000.00</b>

The members of the 2015-16 Executive Board of the 17th LD Democratic Central Committee, nor the signer on the bank account (or whoever took these actions) ever disclosed any of the following expenditures to its voting members at any of its monthly meetings. The voting members did not vote on how these funds would be used. One or more individuals-- without the knowledge or consent of the voting members-- made the decisions to contribute this money to these candidates.

**17th LD Democratic Central Committee (Undisclosed) Expenditures**

<b>Candidate</b>	<b>Date</b>	<b>To</b>
<a href="#">FRIENDS OF SAM KIM</a>	<a href="#">10/24/2016</a>	<a href="#">\$2,500.00</a>
<a href="#">ELECT TIM PROBST</a>	<a href="#">10/24/2016</a>	<a href="#">\$2,000.00</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">10/24/2016</a>	<a href="#">\$500.00</a>
<a href="#">FRIENDS OF SAM KIM</a>	<a href="#">10/17/2016</a>	<a href="#">\$5,200.00</a>
<a href="#">CAMPAIGN TO ELECT ROMAN BATTAN</a>	<a href="#">10/17/2016</a>	<a href="#">\$1,500.00</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">10/17/2016</a>	<a href="#">\$1,500.00</a>
<a href="#">ELECT TIM PROBST</a>	<a href="#">10/16/2016</a>	<a href="#">\$15,600.00</a>
<a href="#">FRIENDS OF SAM KIM</a>	<a href="#">10/16/2016</a>	<a href="#">\$5,200.00</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">10/16/2016</a>	<a href="#">\$700.00</a>
<a href="#">ELECT TIM PROBST</a>	<a href="#">9/8/2016</a>	<a href="#">\$1,700.00</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">9/8/2016</a>	<a href="#">\$300.00</a>
<a href="#">ELECT TIM PROBST</a>	<a href="#">4/11/2016</a>	<a href="#">\$4,800.00</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">4/11/2016</a>	<a href="#">\$200.00</a>
<b>TOTAL</b>	<b>2016</b>	<b>\$39,000.00</b>

**RCW 42.17A.270 (1), (2), & (3) VIOLATIONS?**

**RCW 42.17A.435 VIOLATIONS?**

Did these contributing entities specify which candidates would get this money and/or how much the candidates would get?

**RCW 42.17A.146 VIOLATIONS?**

**RCW 42.17A.470 VIOLATIONS?**

Was the 17th LD Dems an intermediary or a conduit for these contribution from these entities to these candidates? Was there a designation, instruction, or encumbrance, whether direct or indirect, expressed or implied, or oral or written, that was intended to result in or did result in any part of these contributions being made to these certain candidates?

*RCW 42.17A.490 VIOLATION?*

**WHO AUTHORIZED THE TRANSFER OF FUNDS FROM THE HARRIS STATE REP CAMPAIGN TO COUNTY CAMPAIGN?**

Someone had to authorize and sign for the transfer of the 17th LD Democrat’s contribution to the Tanisha Harris State Representative (position 1) campaign to her County Council (position 3) campaign. It was not Richard McCluskey. Who was it? Please provide the copy of the signed authorization because the 17th LD Democrats did not vote on this during any monthly meeting from April 2016 until present, nor was it ever mentioned at any of their monthly meetings.

<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">4/11/2016</a>
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**WERE SPECIAL REPORTS REQUIRED FOR THESE?**

Were special reports required for the below transactions due to the dates being within 21 days of the election and the amounts or aggregated totals being over \$1,000.00? If so, were special reports filed?

<a href="#">SEIU HEALTHCARE, 1199 NW</a>	<a href="#">10/24/2016</a>
<a href="#">FRIENDS OF SAM KIM</a>	<a href="#">10/24/2016</a>
<a href="#">ELECT TIM PROBST</a>	<a href="#">10/24/2016</a>
<a href="#">ELECT TANISHA HARRIS</a>	<a href="#">10/24/2016</a>

**RCW 42.17A.220(1) VIOLATION?**

**DELAYS IN RECEIVING, DEPOSITING, OR REPORTING?**

Were all these really received that long after they were made? Were there delays in depositing and/or reporting them?

The [PDC website shows](#) that SERVICE EMPLOYEES INTL UNION 1199 NORTHWEST PAC expended a contribution to 17TH LEGISLATIVE DISTRICT DEMOCRATIC CENTRAL COMMITTEE on **10/7/2016** for \$5,000.00 and [shows it reported](#) on **10/24/2016** which is more than 5 days after the contribution was made.

The [PDC website shows](#) that HARRY TRUMAN FUND expended a contribution to LD DEMOCRATS on **10/5/2016** for \$5,500.00 and [shows it reported](#) on **10/15/2016**.

The [PDC website shows](#) that SEIU 775 QUALITY CARE COMMITTEE expended a contribution to 17TH LEG DIST DEMO CENT COMM NON EXEMPT on **9/30/2016** for \$5,000.00 and [shows it reported](#) on **10/15/2016**.

The [PDC website shows](#) that WA & NORTHERN IDAHO DIST COUNCIL OF LABORERS PAC expended a contribution to 17TH LEGISLATIVE DISTRICT DEMOCRATS on **9/28/2016** for \$500.00 and [shows it reported](#) on **10/15/2016**.

The [PDC website shows](#) that KENNEDY FUND expended a contribution to 17TH LEGISLATIVE DISTRICT DEMOCRATS on **9/14/2016** for \$5,500.00 and [shows it reported](#) on **9/28/2016**.

The [PDC website shows](#) that JEFFERSON CO DEMOS & CENT COMM NON EXEMPT expended a contribution to 17TH DISTRICT DEMOCRATS on **8/25/2016** for \$1,000.00 and [shows it reported](#) on **9/8/2016**.

The [PDC website shows](#) that JEFFERSON CO DEMOS & CENT COMM NON EXEMPT expended a contribution to 17TH DISTRICT DEMOCRATS on **7/12/2016** for \$1,000.00 and [shows it reported](#) on **7/21/2016**.

The [PDC website shows](#) that WA & NORTHERN IDAHO DIST COUNCIL OF LABORERS PAC expended a contribution to 17TH LEGISLATIVE DISTRICT DEMOCRATS on **3/23/2016** for \$5,000.00 and [shows it received](#) on **3/23/2016** but not deposited until **4/11/2016**.

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

Voting members of this organization, let alone the public, did not know these this were happening. They couldn't make informed decisions without this information.

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

You will probably need to use your subpoena powers to get all the relevant information regarding these complaints. I do not expect the alleged violators to be forthcoming or hand over all evidence. There appears to be a collaborative effort to cover up these issues.

**List of potential witnesses with contact information to reach them.**

Cathy Golick, Marsha Manning, Pete Aller, Erich Orth, Tanisha Harris, SEIU HEALTHCARE 1199 NW, WASHINGTON FEDERATION OF STATE EMPLOYEES SSF, HARRY TRUMAN FUND, JUSTICE FOR ALL PAC, SEIU 775 QUALITY CARE COMMITTEE, WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, KENNEDY FUND, JEFFERSON COUNTY DEMOCRATS CENTRAL COMMITTEE, WASHINGTON & NORTHERN IDAHO DISTRICT COUNCIL OF LABORERS PAC, Carrie Parks, Hattie Stigham, Kyle Sinnot, Heather Sinnot, Terah Pitchford,

**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.