

OCT 24 2011

Office Use Only: No. \_\_\_\_\_

Public Disclosure Commission



**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION  
COMPLAINT FORM**

*(See instructions on the last page.)*

**Description of Complaint**

**1. RESPONDENT:**

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

*Example #1: Joe Public, Mayor of My Town,*

*123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown*

*Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,*

*Phone: 555-123-4567, Email: pag@pag.org*

Gil Mendoza (former Sumner School District Superintendent) 10802 159<sup>th</sup> Ave Ea,  
Puyallup, WA 98374. Hm 253-845-3260. Cell 253-377-5828. Email gilmend@comcast.net

Citizens Advocating a Responsible Education System (C.A.R.E.S.)

P.O. Box 100, Sumner, WA 98390

**2. ALLEGED VIOLATIONS:**

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17 or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed.

On or about October 18<sup>th</sup>, 2011, Gil Mendoza mailed 24,288 political fliers encouraging voters to vote for specified Sumner School District Board of Directors candidates in the upcoming election (November 8, 2011). Gil Mendoza and the group he is representing (CARES) did not report any contributions or expenditures to the Washington Public Disclosure Commission. The flier also did not clearly state that its contents were not authorized by a candidate, nor did it clearly state who paid for the statement/advertisement (as required by law RCW 42.17.510 (2) (a).

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OCT 24 2011

**Evidence and Witnesses**

Public Disclosure Act

**3. EVIDENCE:**

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

On or about 10/20/2011, registered voters residing within the Sumner School District received in the mail a political flier from a group identifying themselves as "Citizens Advocating a Responsible Education System" (CARES). Rebecca Giles, observed Gil Mendoza and his niece, Robin Lucas, as they made the bulk mailing on 10/18/11. On 10/21/2011, Bulk Mail Clerk Dawn Bailey confirmed that on 10/18/2011 Gil Mendoza had mailed 24,288 pieces, using Bulk Mail Permit #51. This Bulk Mail permit belongs to a business called "Showcase Media" which is owned by Robin Lucas, Gil Mendoza's niece. The total postage cost for the mailing was \$6,315.00 and was paid for with a personal check from Gil Mendoza. (Additional expenses include printing, folding, and labeling)

**4. WITNESSES:**

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

*Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.*

Rebecca Giles. 1201 Wood Avenue, Sumner, WA 98390. 253-891-6000. Becki is the Sumner School District employee who was in line behind Gil Mendoza and Robin Lucas when they mailed the 24,000+ fliers.

Dawn Bailey. 253-826-0816. Sumner Post Office Bulk Mail Clerk

Robin Lucas. 253-826-9001 Used her business Bulk Mail Permit to mail a political flier from another entity. Her business and return address (Showcase Media) was not identified on the flier (in violation of Postal Regulations)

OCT 24 2011

<b>Certification</b>
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Public Disclosure Committee

**In signing this complaint:**

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Sherman VoilesStreet address 20808 Church Lake Drive EastCity, state and zip code Bonney Lake, WA 98391Telephone number (including area code) 253-335-0485E-mail address (optional) shermv@comcast.net

<b>Oath</b>
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**Required for complaints against elected officials or candidates for elective office:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.\*

Your signature Date signed October 24, 2011

Place signed (city and county)

Tacoma PierceCity Tacoma County Pierce

<b>Attachments</b>
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**X** Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint. (Political Flier Attached)

*\*RCW 9A.72.040 says 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."*

NOV 16 2011

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*Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,*

*Phone: 555-123-4567, Email: pag@pag.org*

Gil Mendoza – Citizens Advocating a Responsible Education System (CARES).

**2. ALLEGED VIOLATIONS:**

**Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17 or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed.**

Gil Mendoza spent nearly \$8,000 on behalf of a slate of 3 candidates for the Sumner School Board. This expenditure certainly had a considerable influence on the election and was a key factor in Mr. Mendoza's candidates winning. The fine for his action should be equal to the impact he had on the election by his illegal expenditure. This was a huge expenditure for a small race.

**Evidence and Witnesses**

**3. EVIDENCE:**

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

I am enclosing a copy of the mailing he sent out. There is also a November 5, 2011 article in The News Tribune further detailing his actions.

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NOV 16 2011

**Certification**

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- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Ron Weigelt

Street address 17701 101<sup>st</sup> Street East

City, state and zip code Bonney Lake, WA 98391

Telephone number (including area code) (206) 387-0512

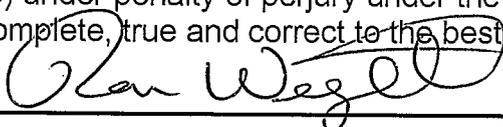
E-mail address (optional) raweigelt@comcast.net

**Oath**

**Required for complaints against elected officials or candidates for elective office:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.\*

Your signature



Date signed 11/13/11

Place signed (city and county)

Bonney Lake

Pierce

City

County

**Attachments**

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

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