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Public Disclosure Commission

**Formal Complaint to the Washington State Public Disclosure Commission
For Complaints Relating to Elected Official or Candidate for Public Office
(If the Sample Complaint Form is Not Used)**

Name of Official or Candidate: David Cordon
Address of Official or Candidate: PO Box 412
Official's or Candidate's Spokane WA 99210
City State Zip Code
Official's or Candidate's Telephone: 509-993-2633
(Include Area Code)
Official's or Candidate's E-Mail Address: _____
(If known)

Your signature: 
Your printed name: Tanya Riordan
Street address: 220 W. Woodway
City, state and zip code: Spokane, WA 99218
Telephone number: 509-990-9777
E-Mail Address: (Optional) Tanyariordan@comcast.net
Date Signed: 11-3-11
Place Signed (City and County): Spokane, Spokane
City County

Complaint: Attach Complaint and Certification

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**Certification for a
Complaint to the Washington State Public Disclosure Commission Relating to an
Elected Official or Candidate for Public Office
(Notary Not Required)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature: 

Your printed name: Tanya Riordan

Street address: 220 W. Woodway Ave.

City, state and zip code: SPOKANE, WA 99212

Telephone number: 509-990-9777

E-Mail Address: (Optional) Tanya.Riordan@comcast.net

Date Signed: 11-3-11

Place Signed (City and County): SPOKANE, SPOKANE
City County

*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."

COMPLAINT ATTACHED

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November 3, 2011

Washington State Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

Public Disclosure Commission

RE: Violation of WAC 390-05-210(5)(b) by the Condon for Mayor Campaign

This complaint alleges that the Condon for Mayor Campaign is illegally coordinating with the Washington State Republican Party (Non-Exempt) by funneling campaign donations through Republican Party coffers from five Spokane donors who have already given the maximum allowable amount to the campaign.

This activity by the Condon for Mayor Campaign violates Washington Administrative Code 390-05-210(3) & (5)(b) which prohibits political parties from acting as agents of a campaign to circumvent individual campaign contribution limits.

Background:

On October 17, 2011, the Washington State Republican Party (Non-Exempt) submitted a C3 report detailing \$25,000 from the following five Spokane donors:¹

- Northwest Industrial Services - \$4000
- Barr-Tech - \$4000
- DAA Northwest - \$4000
- Rod Schneidmiller - \$8000
- Hoyt Larson - \$5000

Total = \$25,000

All of the donors listed above (or executives of the corporations above) have already contributed the maximum allowable amount to the Condon campaign.

- Northwest Industrial Services made two separate \$800 contributions to Condon's campaign on May 24, 2011²
- Barr-Tech owner Ted Condon made two separate \$800 contributions to Condon's campaign on August 3, 2011³
- DAA Northwest made an \$800 contribution to Condon's campaign on May 31, 2011 and another \$800 contribution on August 10, 2011.^{4 5}

¹ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100432938>

² <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100424665>

³ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100423114>

⁴ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100424727>

⁵ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100412435>

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DAA Northwest President Robert McConkey made an \$800 contribution to Condon's campaign on June 14, 2011 and General Manager Gregory Manhugh made an \$800 contribution on May 31, 2011.

- Rod Schneidmiller made two separate \$800 contributions to Condon's campaign on May 24, 2011.⁶
 - Gigi Schneidmiller, Rod Schneidmiller's spouse, also made two separate \$800 donations to Condon's campaign on May 31, 2011.⁷
- Hoyt Larison made two separate \$800 contributions to the Condon campaign on May 31, 2011 (the report lists "Hoyt Larson", but the address matches the contribution made by Hoyt Larison on Oct 27, 2011).⁸

On October 27, 2011, the Washington State Republican Party (Non-Exempt) made a \$25,000 donation to the Condon for Mayor campaign.⁹

The amount of the donation to the Condon campaign matches the aggregate total of contributions made previously by the group of donors from Spokane who have already contributed the maximum amount allowable to the Condon campaign.

Evidence:

In addition to the documented contributions detailed above, this complaint is supported by the following facts:

- The donations to the Washington State Republican Party (Non-Exempt) from the above Spokane donors were all received within a three day period (10/11/11 – 10/13/11), and just a few days prior to the contribution to made to Condon's campaign
- The Spokane donors (with the exception of Rod Schneidmiller who made a single contribution on September 6, 2011¹⁰) have not contributed to the Washington State Republican Party previously
- All of the Spokane donors (or executives of the previously mentioned corporations) have already maxed out to the Condon campaign
- The aggregate amount received by the Washington State Republican Party (Non-Exempt) matches the amount of the corresponding contribution to the Condon campaign

⁶ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100424665>

⁷ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100412435>

⁸ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100412435>

⁹ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100436331>

¹⁰ <http://www.pdc.wa.gov/rptimg/default.aspx?batchnumber=100427952>