

De'Sean Quinn
4636 S. 150th Street
Tukwila, WA 98188
(206) 331-5939
deseanquinn@gmail.com

October 23, 2017

VIA EMAIL

Tony Perkins
Investigator, Campaign Finance Office
Washington Attorney General's Office
PO Box 40100
Olympia, WA 98504-0100

Re: Citizen Action Notice – De'Sean Quinn (7)

Dear Mr. Perkins:

I am writing in response to the most recent complaint filed against me by Glen Morgan on October 4, 2017. Again, thank you for the opportunity to respond.

1) Failure to file accurate, timely C3 and C4 reports (Violation of RCW 42.17A.235)

Mr. Morgan identifies six (6) reports that he cites as being late simply by virtue of having been amended at some point. None of the C3s and C4s in question in this complaint were submitted late. At that time they were filed we were complying with State statutes for transparency and we later amended the reports once we had more complete information. All of the amendments we have made have been done at the recommendation of the Public Disclosure Commission ("PDC") to avoid further complaints and accusations from Mr. Morgan. To now use this to file retroactive complaints against me is simply not right and is akin to double jeopardy. All reports have been filed timely with the intent of compliance with the PDC. All reports have been made. Reports that were questioned have been amended. I respectfully request that any amended C3s and C4s (that are in compliance) not be subjected to violations of State law.

2) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-037)

In response to the allegation that I illegally failed to break down in-kind contributions related to legal services, we followed the guidance from the PDC (Mr. Fox Blackburn) while trying to take into consideration the very limited space that is provided in the ORCA software for in-kind contributions. Before receiving notice of this complaint we reviewed all reports and amended the descriptions after consulting with the PDC.

Tony Perkins
October 23, 2017
Page 2

In response to the allegation that I illegally failed to include the quantity of the items ordered from my printer on June 7, 2017 and May 20, 2017, the quantity of items for these expenses and were provided prior to receiving this complaint. See Attachment A.

3) Failure to disclose debts. (Violation of RCW 42.17A.235)

In response to the allegation that I have failed to disclose legal fees as debt on C4s and further stating that I must list the name of the law firm that provided the service is a rehash of his same complaint in his August 17 PDC complaint. As I stated in my response dated September 29, 2017 (a copy of which was sent to Lisa Boggess, Paralegal 2, Campaign Finance Unit, Office of the Attorney General), I retained the service of an attorney to review the RCWs related to PDC reporting laws. I amended my C4s to include both the money that I paid as well as the in-kind services that I received.

To response to the allegation that I failed to disclose the purchase of newspaper space in the Tukwila Reporter in C4s as debt, the order for the ad space was, submitted and paid for in September and appears in the proper place on the C4 covering that period.

Once again I believe I have been very transparent with the PDC and the Attorney General and have timely and thoroughly responded to each complaint. Nothing I have done has been done with any ill intent or any attempt to deceive.

As you know, complaints to the PDC are made public. I would like to reiterate that Mr. Morgan's very detailed complaints to the Attorney General combined with his use of inflammatory and untrue statements and innuendos leads the public to believe that his accusations are true. In fact, his continued complaints are bordering on harassment and libel. It appears that when he does not like a response he will reframe his accusation and file another report. I take campaign laws very seriously. I strive to file reports that are accurate and thorough and not subject to misinterpretation and to be compliant with PDC rules and the RCWs. His goal is to mislead and plant seeds of distrust because of his belief that people that do not share his views cannot be of service to their community. In fact, he has stated on several occasions in media outlets that his purpose is to make sure candidates are compliant with the rules. I would argue that is not his intent. If it were he would not be filing complaints on compliant amended PDC reports or complaints that are unfounded and erroneous like the assumption that an ad was paid for or accrued in August with no facts or documents to suggest otherwise. See Attachment B.

I trust that I have satisfied your request and would make myself available to provide more information it is important to me to comply with not only the PDC but your office as well.

Sincerely,

De'Sean Quinn

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	100790545
	AMENDS
	100790473
	10-05-2017

Candidate or Committee Name (Do not abbreviate. Include full name)
 DE'SEAN QUINN (People for De'Sean Quinn)

Mailing Address
 PO Box 88903

City
 Tukwila, WA

Zip + 4 98138	Office Sought (Candidates) CITY COUNCIL MEMBER	Election Date 2017
Report Period Covered From (last C-4) 06/01/17	To (end of period) 07/10/17	Final Report? Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)			\$ 3,717.61
2. Cash received (From line 2, Schedule A)	\$ 4,320.05		
3. In kind contributions received (From line 1, Schedule B).....	281.21		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			4,601.26
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			8,318.87
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		3,470.24
11. Total cash expenditures (From line 4, Schedule A)	2,308.16	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	281.21	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		2,589.37
14. Loan principal repayments made (From line 2, Schedule L).....	0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00	
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		6,059.61

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
 (509) 499-2274

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17)	2,259.26
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed)	3,800.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	-1,540.74

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature DE'SEAN QUINN	Date 07/11/17	Treasurer's Signature Garrett Havens	Date
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4 **A**
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date
 DE'SEAN QUINN (People for De'Sean Quinn) 06/01/17 07/10/17

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
06/01/2017	300.00	06/01/2017	1,000.00	06/16/2017	0.05	
06/07/2017	275.00	06/08/2017	845.00	06/18/2017	1,000.00	
06/05/2017	50.00	06/14/2017	100.00	See attached		

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 4,320.05

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	28.64
06/23/17	B&B STRATEGIES 23305 97th Pl W Edmonds, WA 98020		B&B STRATEGIES, General Consulting, Management, Treasury, Design	1,000.00
06/07/17	OVERNIGHT PRINTING 2412 1st Avenue South Seattle, WA 98134		40 signs & h-frames, 500 flyers, 250 stickers	839.12
06/26/17	OVERNIGHT PRINTING 2412 1st Avenue South Seattle, WA 98134		50 Yard Signs and H-frames	440.40

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 2,308.16

**Attachment to Schedule A
Additional Deposits**

for the period: 06/01/17 07/10/17

3

Name

DE'SEAN QUINN (People for De'Sean Quinn)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
06/18/17	500.00				
06/20/17	100.00				
06/21/17	50.00				
06/30/17	100.00				

LOANS

**SCHEDULE
TO C4**

L

(12/99)

6

Candidate or Committee Name DE'SEAN QUINN (People for De'Sean Quinn)		Report Date 06/01/17 07/10/17	
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4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount	Principal Repaid or Forgiven	Amount Owed
06/01/17	DE'SEAN QUINN 4636 S 150th St Tukwila, WA 98188	1,000.00	0.00	1,000.00
			Subtotal This Page	1,000.00

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4 (3/97)	PDC OFFICE USE
	100790472
	AMENDS
	100789361
	10-05-2017

Candidate or Committee Name (Do not abbreviate. Include full name)
 DE'SEAN QUINN (People for De'Sean Quinn)

Mailing Address
 PO Box 88903

City
 Tukwila, WA

Zip + 4 98138	Office Sought (Candidates) CITY COUNCIL MEMBER	Election Date 2017
Report Period Covered From (last C-4) 05/01/17	To (end of period) 05/31/17	Final Report? Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)			\$ 0.00
2. Cash received (From line 2, Schedule A)	\$ 2,680.02		
3. In kind contributions received (From line 1, Schedule B).....	1,037.59		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			3,717.61
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)			3,717.61
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)	1,000.00
11. Total cash expenditures (From line 4, Schedule A)	1,432.65
12. In kind expenditures (goods & services) (From line 1, Schedule B)	1,037.59
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	2,470.24
14. Loan principal repayments made (From line 2, Schedule L).....	0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	3,470.24

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
 (509) 499-2274

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17)	247.37
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed)	4,000.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	-3,752.63

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature DE'SEAN QUINN	Date 06/12/17	Treasurer's Signature Garrett Havens	Date
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CASH RECEIPTS AND EXPENDITURE

SCHEDULE
 to C4
A
(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date
 DE'SEAN QUINN (People for De'Sean Quinn) 05/01/17 05/31/17

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
05/09/2017	630.00	05/17/2017	100.00	05/23/2017	100.00	
05/10/2017	500.00	05/22/2017	250.00	05/24/2017	250.00	
05/11/2017	600.00	05/19/2017	0.02	See attached		

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 2,680.02

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

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3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	140.87
05/19/17	B&B STRATEGIES 23305 97th Pl W Edmonds, WA 98020		B&B STRATEGIES, General Consulting, Website, Po Box, Design, Treasury	1,000.00
05/15/17	WASHINGTON STATE DEMOCRATS 615 2nd Ave #580 Seattle, WA 98104		Votebuilder Access	84.77
05/20/17	OVERNIGHT PRINTING 2412 1st Avenue South Seattle, WA 98134		500 Remit Envelopes	207.01

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 1,432.65

**Attachment to Schedule A
Additional Deposits**

for the period: 05/01/17 05/31/17

3

Name

DE'SEAN QUINN (People for De'Sean Quinn)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
05/26/17	250.00				



Glen Morgan



October 12 at 5:51pm · 🌐

I am planning to live blog another PDC complaint filing marathon tonight. I hope to break my one night record of 10 from a few weeks ago. Should start around 9pm or so (kids bedtime is earlier now that school is in session). I am planning to focus on committees tonight... at least to start...

Like Comment Share

89

[View previous comments](#)



Eddie Lewis Go go go

Like · Reply · 1 · October 13 at 10:32pm



Terry-Stanley Ballard Did you include Steadman?

Like · Reply · 1 · October 13 at 10:57pm

↳ Terry-Stanley Ballard replied · 2 Replies



Stephen Maturin So...why are you trying to destroy your country? Did you get dropped on your head?

Like · Reply · 1 · October 14 at 11:01pm

↳ Joe Labarbera replied · 4 Replies



Alene Lindstrand Excellent!

Like · Reply · 1 · October 14 at 11:56pm

Chat (33)