

To whom it may concern,

It has come to my attention that a wide variety and quantity of violations of **RCW 42.17A** may have been committed by Karen Fraser during her failed 2016 campaign for the Washington State Lieutenant Governor office. The details of these violations are as follows:

(1) Failure to timely file C3 and C4 reports on the day the treasurer is designated (Violation of RCW 42.17A.235(1)).

RCW [42.17A.235](#)(1) states that “on the day the treasurer is designated, each candidate or political committee must file with the commission a report of all contributions received and expenditures made prior to that date, if any.”

Ms. Fraser filed her [C1 Report](#), which designated Christine Garst as her treasurer, on 10/5/15. Ms. Fraser violated RCW [42.17A.235](#)(1) eight times by failing to timely report contributions and expenditures made prior to that date.

- Ms. Fraser made a \$110 in-kind contribution for “post office box rental” on 9/22/15. Rather than reporting the contribution on 10/5/15, Ms. Fraser reported it 8 days late on 10/13/15 (see Report No. [100662056](#)).
- Ms. Fraser made **two** in-kind contributions, each worth \$9, for “PO Box keys” on 9/22/15. Rather than reporting these two contributions on 10/5/15, Ms. Fraser reported them 8 days late on 10/13/15 (see Report No. [100662056](#)).
- Ms. Fraser made a \$50 expenditure on 9/22/15. Rather than reporting this expenditure on 10/5/15, Ms. Fraser reported it 8 days late on 10/13/15 (see Report No. [100662056](#)).
- Ms. Fraser made a \$10,000 contribution to her campaign on 9/23/15. Rather than reporting this contribution on 10/5/15, Ms. Fraser reported it 8 days late on 10/13/15 (see Report No. [100662052](#)).
- Ms. Fraser made a \$0.03 miscellaneous contribution on 9/30/15. Rather than reporting this contribution on 10/5/15, Ms. Fraser reported it 13 days late on 10/18/15 (see Report No. [100662710](#)).
- Ms. Fraser made a \$33.11 expenditure on 10/1/15. Rather than reporting this expenditure on 10/5/15, Ms. Fraser reported it 30 days late on 11/4/15 (see Report No. [100667203](#)).
- Ms. Fraser paid \$3320.87 to Mocrete for “website developer” on 10/1/15. Rather than reporting this expenditure on 10/5/15, Ms. Fraser reported it 30 days late on 11/4/15 (see Report No. [100667203](#)).

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

RCW [42.17A.235](#) requires candidates and committees to file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Ms. Fraser violated this statute as follows:

- Ms. Fraser reported receiving a **\$2000 contribution** from RPEC PAC on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that RPAC PAC made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **6 days late**.
- Ms. Fraser reported receiving a **\$500 contribution** from Raad & Associates, LLC on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Raad & Associates, LLC made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **6 days late**.
- Ms. Fraser reported receiving a **\$1000 contribution** from IBEW Local 77 PAC on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that IBEW Local 77 PAC made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Marie Spearman on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Marie Spearman made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **6 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Joan O'Sullivan on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Joan O'Sullivan made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **6 days late**.
- Ms. Fraser reported receiving a **\$1000 contribution** from Zula Johnston on 7/21/16, and depositing it on the same day (see Report No.

- [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Zula Johnston made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$1000 contribution** from Patricia Basta on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Patricia Basta made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving a **\$50 contribution** from Lee Blankenship on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Leland Blankenship made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**. **Please note that Leland Blankenship is “double-entered” under different first names but the same address**, resulting in a mis-reporting of his aggregate contribution to Ms. Fraser’s campaign.
 - Ms. Fraser reported receiving a **\$100 contribution** from J A Bricker on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that J A Bricker made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving a **\$100 contribution** from Patricia Fisher on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Patricia Fisher made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have reported this no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error 6 days late.
 - Ms. Fraser reported receiving a **\$200 contribution** from M F Wright-Bjorgen on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that M Fay Wright-Bjorgen made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits

made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.

- Ms. Fraser reported receiving a **\$100 contribution** from Shirley Winsley on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Shirley Winsley made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Walter Bowen, and another \$100 contribution from Karen Bowen, both on 7/21/16, and depositing both on 7/21/16 (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Walt & Karen Bowen made a \$200 contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Joel Greene & Jean Mandeberg on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Joel Greene & Jean Mandeberg made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Jolene Unsoeld on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Jolene Unsoeld made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Wayne Williams on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Wayne Williams made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Melanie Stewart on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Melanie Stewart made the contribution on 7/20/16, and that Ms. Fraser deposited it on

7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.

- Ms. Fraser reported receiving a **\$50 contribution** from Timothy Burke on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Timothy Burke made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Nora Burke on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Nora Burke made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Paul Olson on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Paul Olson made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Barbara Olson on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Barbara Olson made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Charles Shelan on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Charles Shelan made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this **error 6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Norma Shelan on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)).

- Ms. Fraser later reported (on 7/31/16) that Norma Shelan made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Charles Laird on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Charles Laird made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving a **\$50 contribution** from Judith Shepherd on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Judith Shepherd made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving a **\$100 contribution** from Alan Thompson on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Alan Thompson made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving a **\$100 contribution** from Barbara Thompson on 7/21/16, and depositing it on the same day (see Report No. [100710685](#)). Ms. Fraser later reported (on 7/31/16) that Barbara Thompson made the contribution on 7/20/16, and that Ms. Fraser deposited it on 7/21/16 (see Report No. [100712990](#)). Ms. Fraser should have made the correction no later than 7/25/16 (when the C3 reports for deposits made during the week of 7/18/16 to 7/24/16 were due). Instead, she reported this error **6 days late**.
 - Ms. Fraser reported receiving two **\$500 contributions** from Douglas Klan on 10/28/15, one for the primary election, and the other for the general election (see Report No. [100666215](#)). Ms. Fraser later reported that both \$500 contributions were for the primary election. The contributions were deposited on 10/28/15, and Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the error on 11/22/15, **12 days past the statutory deadline** (see Report No. [100668774](#)).

- Ms. Fraser reported receiving two **\$250 contributions** from Tom Brown on 10/28/15, one for the primary election, and the other for the general election (see Report No. [100666215](#)). Ms. Fraser later reported that both \$250 contributions were for the primary election. The contributions were deposited on 10/28/15, and Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the error on 11/22/15, **12 days past the statutory deadline** (see Report No. [100668774](#)).
- Ms. Fraser reported receiving a **\$200 contribution** from David Workman on 10/22/15 and depositing it the same day (see Report No. [100664927](#)). Ms. Fraser later reported that she had deposited the contribution on 10/28/15 (see Report No. [100668639](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Christine Townley on 10/21/15 and depositing it on 10/22/15 (see Report No. [100664927](#)). Ms. Fraser later reported that she had deposited the contribution on 10/28/15 (see Report No. [100668639](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$200 contribution** from Clover Lockard on 10/21/15 and depositing it the same day (see Report No. [100664926](#)). Ms. Fraser later reported that she had deposited the contribution on 10/28/15 (see Report No. [100668638](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Stephen Klein on 10/20/15 and depositing it the same day (see Report No. [100663470](#)). Ms. Fraser later reported that she had deposited the contribution on 10/27/15 (see Report No. [100668637](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Lenore Doyle on 10/19/15 and depositing it the same day (see Report No. [100663296](#)). Ms. Fraser later reported that she had deposited the contribution on 10/26/15 (see Report No. [100668636](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$250 contribution** from Jennifer Belcher on 10/18/15 and depositing it the same day (see Report No. [100663295](#)). Ms. Fraser later reported that she had deposited the contribution on 10/26/15 (see Report No. [100668635](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$50 contribution** from Elke Armajo on 10/17/15 and depositing it the same day (see Report No. [100663294](#)). Ms. Fraser later reported that she had deposited the contribution on

- 10/23/15 (see Report No. [100668634](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported receiving a **\$100 contribution** from Christine Garst on 10/17/15 and depositing it the same day (see Report No. [100663294](#)). Ms. Fraser later reported that she had deposited the contribution on 10/23/15 (see Report No. [100668634](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$50 contribution** from Callie Wilson on 10/14/15 and depositing it the same day (see Report No. [100663293](#)). Ms. Fraser later reported that she had deposited the contribution on 10/21/15 (see Report No. [100668633](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$100 contribution** from Pamela Campbell Mead on 10/14/15 and depositing it the same day (see Report No. [100663293](#)). Ms. Fraser later reported that she had deposited the contribution on 10/21/15 (see Report No. [100668633](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$50 contribution** from Paul Berendt on 10/12/15 and depositing it on 10/13/15 (see Report No. [100662054](#)). Ms. Fraser later reported that she had deposited the contribution on 10/20/15 (see Report No. [100668632](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$50 contribution** from Allen Miller on 10/13/15 and depositing it the same day (see Report No. [100662054](#)). Ms. Fraser later reported that she had deposited the contribution on 10/20/15 (see Report No. [100668632](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$500 contribution** from Rosann Benedict on 10/13/15 and depositing it the same day (see Report No. [100662054](#)). Ms. Fraser later reported that she had deposited the contribution on 10/20/15 (see Report No. [100668632](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
 - Ms. Fraser reported receiving a **\$100 contribution** from Katherine Dick on 10/13/15 and depositing it the same day (see Report No. [100662054](#)). Ms. Fraser later reported that she had deposited the contribution on 10/20/15 (see Report No. [100668632](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.

- Ms. Fraser reported receiving two **\$500 contributions** from Fuller & Fuller on 10/14/15, one for the primary election, and the other for the general election (see Report No. [100662711](#)). Ms. Fraser later reported that **both \$500** contributions were for the primary election. The contributions were deposited on 10/14/15, and Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the error on 11/22/15, **12 days past the statutory deadline** (see Report No. [100668773](#)).
- Ms. Fraser reported receiving a **\$5 small contribution** on 10/9/15 and depositing it on 10/10/15 (see Report No. [100662053](#)). Ms. Fraser later reported that she had deposited the contribution on 10/13/15 (see Report No. [100668631](#)). Ms. Fraser should have reported this error no later than 11/10/15. Instead, she reported the correction on 11/18/15, **8 days late**.
- Ms. Fraser reported that she received a **\$225 “refund deposit for event”** from the Woman’s Club of Olympia on 11/30/15 (see Report No. [100669249](#)). She later reported that she did not receive these receipts (see Report No. [100675318](#)). Ms. Fraser should have made this correction no later than 1/11/16. Instead, she made the correction on 1/12/16, **1 day late**.
- Ms. Fraser reported that she received a **\$450 in-kind contribution** from Jean Gardner on 11/11/15 for “food and beverage for fundraiser” (see Report No. [100675320](#)). Ms. Fraser should have reported this contribution no later than 12/10/15 (see Report No. [100670003](#)). Instead, she reported it on 1/12/16, **33 days past the statutory deadline**.
- In Report No. [100674939](#), Ms. Fraser made a **\$1145 in-kind contribution** on 12/20/15 for “mileage and parking fees – October-December 2015.” Ms. Fraser began making these mileage and parking-fee in-kind contributions in October 2015, and those contributions made in October 2015 should have been reported no later than 11/10/15. Instead, Ms. Fraser reported the October 2015 contributions on 1/11/16, **62 days past the statutory deadline**.
- In Report No. [100674939](#), Ms. Fraser made a **\$1145 in-kind contribution** on 12/20/15 for “mileage and parking fees – October-Decemb 2015.” Ms. Fraser made a portion of those mileage and parking-fee in-kind contributions in November 2015, and those contributions made in November 2015 should have been reported no later than 12/10/15. Instead, Ms. Fraser reported the November 2015 contributions on 1/11/16, **32 days past the statutory deadline**.
- In Report No. [100693754](#), Ms. Fraser made a **\$670.68 in-kind contribution** on 4/18/16 for “January mileage – 1,242 miles @ \$.54.” Ms. Fraser should have reported this contribution no later than 2/10/16, when the C4 report for January 2016 was due. Instead, Ms. Fraser reported this contribution on 5/9/16, **89 days past the statutory deadline**.
- In Report No. [100699622](#), Ms. Fraser paid **\$878.58** to Heather Hendrickson on 5/26/16 for “mileage reimbursement for April and May.” Ms. Hendrickson generated a portion of the mileage in April 2016, and Ms. Fraser should have reported the reimbursement for that portion no later

than 5/11/16. Instead, Ms. Fraser reported the April 2016 mileage reimbursement on 6/7/16, **27 days past the statutory deadline.**

- In Report No. [100711640](#), Ms. Fraser made a **\$1338.12 in-kind contribution** on 7/25/16 for “mileage.” Ms. Fraser later amended the report on 7/31/16 and removed this in-kind contribution (see Report No. [100712992](#)). Ms. Fraser should have made the correction no later than 7/26/16 when the C4 report for the 7/12/16 – 7/25/16 period was due. Instead, she made the correction **5 days late.**
- In Report No. [100711640](#), Ms. Fraser made a **\$910 in-kind contribution** on 7/25/16 for “hotels.” Ms. Fraser later amended the report on 7/31/16 and removed this in-kind contribution (see Report No. [100712992](#)). Ms. Fraser should have made the correction no later than 7/26/16 when the C4 report for the 7/12/16 – 7/25/16 period was due. Instead, she made the correction **5 days late.**
- In Report No. [100711640](#), Ms. Fraser made a \$39 in-kind contribution on 7/25/16 for “ferry, toll bridge, parking.” Ms. Fraser later amended the report on 7/31/16 and removed this in-kind contribution (see Report No. [100712992](#)). Ms. Fraser should have made the correction no later than 7/26/16 when the C4 report for the 7/12/16 – 7/25/16 period was due. Instead, she made the correction **5 days late.**

Please Note: Over \$17,036.38 of donations and contributions were reported late during the Fraser campaign.

(3) Failure to describe goods and/or services in detail_(violation of RCW 42.17A.240)

Ms. Fraser made numerous violations of **RCW [42.17A.235](#)** and **[42.17A.240\(6\)](#)** (which requires a candidate to disclose “the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure”), and **WAC [390-16-037\(3\)](#)** (which requires a candidate to “describe in detail the goods and/or services to be provided by the recipient of the expenditure”). **WAC 390-16-037** also provides three examples of the detail required (Examples A, B and C below).

“Example A: If an expenditure is for a get-out-the-vote campaign, the purpose shall include the following details:

Vendor Name	Purpose	Amount
XYZ Consulting	GOTV—phone bank 28th and 29th Legislative districts	\$1,000

Example B: If an expenditure is for printing, the purpose shall include the following details:

Vendor Name	Purpose	Amount
ABC Printing	5,000 brochures	\$3,000

Example C: If an expenditure is for broadcast political advertisements, the purpose shall include the following details:

Vendor Name	Purpose	Amount
Media King	Television ads	\$50,000
	WZUB TV	\$30,000
	WXXX TV	\$10,000
	WCRB TV	\$10,000

September 2015

- In Report No. [100662712](#), Ms. Fraser made a \$110 in-kind contribution for "post office box rental" on 9/22/15. Ms. Fraser failed to disclose the vendor's name and address.
- In Report No. [100662712](#), Ms. Fraser made **two** \$9 in-kind contributions for "PO Box keys" on 9/22/15, one contribution for the primary election, and the other for the general election. Ms. Fraser failed to disclose the vendor's name and address.

October 2015

- In Report No. [100668649](#), Ms. Fraser paid \$868.72 to Capitol City Press on 10/8/15 for "envelopes and business cards." Ms. Fraser failed to disclose the quantity of envelopes and business cards.
- In Report No. [100668649](#), Ms. Fraser paid \$697.66 to Capitol City Press on 10/9/15 for "letterhead and envelopes." Ms. Fraser failed to disclose the quantity of letterhead and envelopes.
- In Report No. [100668649](#), Ms. Fraser paid \$920 to Communication by Design on 10/10/15 for "design services." Ms. Fraser failed to disclose the purpose of the design services (what they were for).
- In Report No. [100668649](#), Ms. Fraser paid \$66.90 to Office Depot on 10/11/15 for "printing." Ms. Fraser failed to disclose what was printed, the quantity, and the purpose.
- In Report No. [100668649](#), Ms. Fraser paid \$147 to Linda Polzin on 10/12/15 for "stamps." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100668649](#), Ms. Fraser paid \$97.83 to Linda Polzin on 10/12/15 for "printing." Ms. Fraser failed to disclose what was printed, the

quantity, the purpose, the name of the actual vendor, and the vendor's address.

- In Report No. [100668649](#), Ms. Fraser paid \$1596 to Jessica Boad on 10/30/15 for "fundraising consulting." Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100668649](#), Ms. Fraser paid \$470.27 to Capitol City Press on 10/26/15 for "volunteer postcards." Ms. Fraser failed to disclose the quantity of volunteer postcards.
- In Report No. [100668649](#), Ms. Fraser received a \$44 in-kind contribution from Camille Hale on 10/30/15 for "food and beverage for event." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100668649](#), Ms. Fraser received a \$81.62 in-kind contribution from Les Eldridge on 10/30/15 for "food and beverage for event." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100668649](#), Ms. Fraser received a \$81.61 in-kind contribution from Mary Eldridge on 10/30/15 for "food and beverage for event." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100668649](#), Ms. Fraser received a \$145 in-kind contribution from Earlyse Swift on 10/30/15 for "beverages for event." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.

November 2015

- In Report No. [100675320](#), Ms. Fraser paid \$119.57 to Capitol City Press on 11/3/15 for "yard signs." Ms. Fraser failed to disclose the quantity of yard signs.
- In Report No. [100675320](#), Ms. Fraser paid \$360.23 to Christine Garst on 11/16/15 for "beverages for fundraisers." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.
- In Report No. [100675320](#), Ms. Fraser paid \$92.40 to Communication by Design on 11/5/15 for "printing event invitations." Ms. Fraser failed to disclose the quantity of invitations.
- In Report No. [100675320](#), Ms. Fraser made a \$200 in-kind contribution on 11/1/15 for "graphic services." Ms. Fraser failed to disclose the name of the actual vendor, the vendor's address, and the purpose of the graphic services.
- In Report No. [100675320](#), Ms. Fraser received a \$450 in-kind contribution from Jean Gardner on 11/11/15 for "food and beverage for fundraiser." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.

- In Report No. [100675320](#), Ms. Fraser received a \$100 in-kind contribution from Helen Carlstrom on 11/17/15 for “cakes for fundraiser.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100675320](#), Ms. Fraser made a \$140 in-kind contribution on 11/19/15 for “campaign consulting – Matson Coaching.” Ms. Fraser failed to disclose the vendor’s address.

December 2015

- In Report No. [100675321](#), Ms. Fraser paid \$2750 to Jessica Boad on 12/3/15 for “fundraising consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100675321](#), Ms. Fraser paid \$121.73 to Jessica Boad on 12/10/15 for “Office Depot – labels and envelopes for mailing.” Ms. Fraser failed to disclose quantity of labels and envelopes, and the address of the actual vendor (i.e., Office Depot).
- In Report No. [100675321](#), Ms. Fraser paid \$196 to Jessica Boad on 12/10/15 for “Olympia post office – stamps for mailing.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100675321](#), Ms. Fraser paid \$1007.95 to Capitol City Press on 12/2/15 for “letterhead and envelopes.” Ms. Fraser failed to disclose the quantity of letterhead and envelopes.
- In Report No. [100675321](#), Ms. Fraser made a \$100 in-kind contribution on 12/3/15 for “Matson Coaching and Consulting – communications.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100675321](#), Ms. Fraser received a \$88.18 in-kind contribution from Kerry McKenna on 12/5/15 for “refreshments for Tacoma fundraiser.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100675321](#), Ms. Fraser received a \$40 in-kind contribution from Diane Tilstra on 12/5/15 for “IBEW Local 76 hall rental.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100675321](#), Ms. Fraser made a \$11.42 in-kind contribution on 12/11/15 for “TAGS – name tags.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100675321](#), Ms. Fraser made a \$1145 in-kind contribution on 12/20/15 for “mileage and parking fees – October-December 2015.” Ms. Fraser failed to disclose the names of the actual vendors and the vendors’ addresses.
- In Report No. [100675321](#), Ms. Fraser made a \$150 in-kind contribution on 12/27/15 for “communications consulting.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.

January 2016

- In Report No. [100677450](#), Ms. Fraser paid \$1620 to Jessica Boad on 1/5/16 for “fundraising consultant.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100677450](#), Ms. Fraser paid \$237.50 to Percival Consulting Group on 1/5/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100677450](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 1/15/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100677450](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 1/29/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100677450](#), Ms. Fraser made a \$100 in-kind contribution on 1/3/16 for “communication services.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100677450](#), Ms. Fraser made a \$64.33 in-kind contribution on 1/20/16 for “copies – FedEx Office.” Ms. Fraser failed to disclose the quantity of copies, the purpose of the copies, and the vendor’s address.

February 2016

- In Report No. [100680008](#), Ms. Fraser paid \$875 to Percival Consulting Group on 2/1/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100680008](#), Ms. Fraser paid \$113.12 to Heather Hendrickson on 2/2/16 for “reimbursement – FedEx Office – copies.” Ms. Fraser failed to disclose the quantity of copies, the purpose of the copies, and the vendor’s address.
- In Report No. [100680008](#), Ms. Fraser paid \$930.41 to Capitol City Press on 2/7/16 for “yard signs, labels.” Ms. Fraser failed to disclose the quantity of yard signs and labels.
- In Report No. [100680008](#), Ms. Fraser paid herself \$349.90 on 2/10/16 for “Taco Guymas y Mas – hospitality event.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100680008](#), Ms. Fraser paid herself \$238.36 on 2/10/16 for “Best Western Alderwood – hotel room for State meeting.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100680008](#), Ms. Fraser paid herself \$80 on 2/10/16 for “Verizon – cell phones.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100680008](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 2/12/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100680008](#), Ms. Fraser paid \$81.91 to Heather Hendrickson on 2/23/16 for “FedEx Office – printing.” Ms. Fraser failed to disclose what

was printed, the purpose of the printing, the quantity of the printing, and the vendor's address.

- In Report No. [100680008](#), Ms. Fraser paid \$502.67 to Heather Hendrickson on 2/26/16 for "Office Depot – printer, ink, paper, envelopes." Ms. Fraser failed to disclose the vendor's address.
- In Report No. [100680008](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 2/29/16 for "campaign manager." Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100680008](#), Ms. Fraser paid \$246.58 to Capitol City Press on 2/27/16 for "printing – handouts." Ms. Fraser failed to disclose the purpose and quantity of handouts.
- In Report No. [100680008](#), Ms. Fraser paid \$275.25 to Coprintco on 2/29/16 for "business cards." Ms. Fraser failed to disclose the quantity of business cards.
- In Report No. [100680008](#), Ms. Fraser received a \$9.91 in-kind contribution from Christine Garst on 2/8/16 for "stamps." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.

March 2016

- In Report No. [100689677](#), Ms. Fraser paid \$375 to Grand Crossing Consulting on 3/3/16 for "consulting." Ms. Fraser failed to disclose the purpose of the consulting and the dates the services were provided.
- In Report No. [100689677](#), Ms. Fraser paid \$1000 to Jessica Boad on 3/7/16 for "fundraising consulting." Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100689677](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 3/15/16 for "campaign manager." Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100689677](#), Ms. Fraser paid \$162.50 to Heather Hendrickson on 3/22/16 for "FedEx Office – printing." Ms. Fraser failed to disclose the purpose of the printing, the quantity of printing, and the vendor's address.
- In Report No. [100689677](#), Ms. Fraser paid \$160.97 to Heather Hendrickson on 3/22/16 for "Hilton Vancouver." Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100689677](#), Ms. Fraser paid \$243.58 to Capitol City Press on 3/29/16 for "printing – handouts." Ms. Fraser failed to disclose the quantity and purpose of the handouts.
- In Report No. [100689677](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 3/31/16 for "campaign manager." Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100689677](#), Ms. Fraser paid \$1500 to Grand Crossing Consulting on 3/31/16 for "consulting." Ms. Fraser failed to disclose the purpose of the consulting and the dates the services were provided.

- In Report No. [100689677](#), Ms. Fraser made a \$707.88 in-kind contribution on 3/9/16 for “mileage, parking, tolls.” Ms. Fraser failed to disclose the names of the actual vendors and the vendors’ addresses.
- In Report No. [100689677](#), Ms. Fraser made a \$250 in-kind contribution on 3/9/16 for “donation to Washington State Democrats.” Ms. Fraser failed to disclose the address of the Washington State Democrats.
- In Report No. [100689677](#), Ms. Fraser received a \$9.80 in-kind contribution from Christine Garst on 3/20/16 for “stamps.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100689677](#), Ms. Fraser made a \$1467.54 in-kind contribution on 3/31/16 for “mileage, hotel, parking, tolls.” Ms. Fraser failed to disclose the names of the actual vendors and the vendors’ addresses.
- In Report No. [100689677](#), Ms. Fraser made a \$80 in-kind contribution on 3/31/16 for “cell phone.” Ms. Fraser failed to disclose the name of the actual vendor and the vendor’s address.
- In Report No. [100689677](#), Ms. Fraser made a \$75 in-kind contribution on 3/31/16 for “communication services.” Ms. Fraser failed to disclose the purpose of the services, the name of the actual vendor, and the vendor’s address.

April 2016

- In Report No. [100693754](#), Ms. Fraser paid \$80 to herself on 4/6/16 for “cell phone.” Ms. Fraser failed to disclose the name of the vendor and the vendor’s address.
- In Report No. [100693754](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 4/15/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100693754](#), Ms. Fraser paid \$267.67 to Capitol City Press on 4/13/16 for “handouts.” Ms. Fraser failed to disclose the quantity and purpose of the handouts.
- In Report No. [100693754](#), Ms. Fraser paid \$880.20 to Coprintco on 4/13/16 for “remit envelopes.” Ms. Fraser failed to disclose the quantity of remit envelopes.
- In Report No. [100693754](#), Ms. Fraser paid \$460 to the Woman’s Club of Olympia on 4/13/16 for “May 4 event.” Ms. Fraser failed to disclose the purpose of the purchase (e.g., rental space, booth fee).
- In Report No. [100693754](#), Ms. Fraser \$86 to Department of Labor & Industries on 4/19/16 for “Labor & Industries.” Ms. Fraser failed to disclose the vendor’s address and the purpose of the expenditure.
- In Report No. [100693754](#), Ms. Fraser paid \$375 to Percival Consulting Group on 4/19/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.

- In Report No. [100693754](#), Ms. Fraser paid \$119 to Communication by Design on 4/21/16 for “design services.” Ms. Fraser failed to disclose what the design services were for (e.g., mailer, handouts, invitation).
- In Report No. [100693754](#), Ms. Fraser paid \$1500 to Grand Crossing Consulting on 4/26/16 for “consulting.” Ms. Fraser failed to disclose the purpose of the consulting (e.g., messaging, precinct analysis, attack strategy) and the dates the services were provided.
- In Report No. [100693754](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 4/29/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100693754](#), Ms. Fraser paid \$1412 to the US Treasury on 4/15/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100693754](#), Ms. Fraser made a \$822 in-kind contribution on 4/30/16 for “hotel, parking, tolls.” Ms. Fraser failed to disclose the names of the vendors, the vendors’ addresses, and the dates she paid the vendors.

May 2016

- In Report No. [100699622](#), Ms. Fraser paid \$393.75 to Percival Consulting Group on 5/4/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100699622](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 5/13/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100699622](#), Ms. Fraser paid \$661.46 to Coprintco on 5/13/16 for “business cards.” Ms. Fraser failed to disclose the quantity of business cards.
- In Report No. [100699622](#), Ms. Fraser paid \$2750 to Jessica Boad on 5/16/16 for “fundraising consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100699622](#), Ms. Fraser paid \$212.50 to Percival Consulting Group on 5/25/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100699622](#), Ms. Fraser paid \$878.58 to the US Treasury on 5/31/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100699622](#), Ms. Fraser paid \$1008.80 to the Washington Secretary of State on 5/16/16 for “filing fee.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100699622](#), Ms. Fraser received a \$250 in-kind contribution from Helen Carlstrom on 5/12/16 for “food for fundraiser.” Ms. Fraser failed to report the name of the actual vendor and the vendor’s address.

- In Report No. [100699622](#), Ms. Fraser received a \$240 in-kind contribution from Christine Parsons on 5/27/16 for “food and beverage for Leavenworth fundraiser.” Ms. Fraser failed to report the name of the actual vendor and the vendor’s address.
- In Report No. [100699622](#), Ms. Fraser made a \$629 in-kind contribution on 5/31/16 for “parking, ferries, hotels.” Ms. Fraser failed to disclose the names of the actual vendors, the vendors’ addresses, and the exact dates the expenditures were made.
- In Report No. [100699622](#), Ms. Fraser made a \$41 in-kind contribution on 5/31/16 for “copies – Fed Ex.” Ms. Fraser failed to disclose the quantity of copies, the purpose of the copies (e.g., handouts, fundraising letters), and the vendor’s address.
- In Report No. [100699622](#), Ms. Fraser made a \$180.80 in-kind contribution on 5/31/16 for “cell phones.” Ms. Fraser failed to disclose the name of the actual vendor, and the vendor’s address.

6/1/16 to 7/11/16

- In Report No. [100708051](#), Ms. Fraser paid \$613.11 to Northwest Event Decorators on 6/1/16 for “tables and chairs for fundraiser.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100708051](#), Ms. Fraser paid \$2750 to Jessica Boad on 6/6/16 for “fundraising consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$110.35 to Jessica Boad on 6/6/16 for “Thriftway – event beverages.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100708051](#), Ms. Fraser paid \$230.36 to Jessica Boad on 6/6/16 for “Office Depot – mailing supplies.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100708051](#), Ms. Fraser paid \$235 to Jessica Boad on 6/6/16 for “USPS – stamps.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100708051](#), Ms. Fraser paid \$1500 to Grand Crossing Consulting on 6/11/16 for “consulting services.” Ms. Fraser failed to disclose the purpose of the consulting (e.g., messaging, precinct analysis, attack strategy) and the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$300 to Percival Consulting Group on 6/11/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$8165.20 to Boruck Printing & Silkscreen on 6/15/16 for “yard signs.” Ms. Fraser failed to disclose the quantity of yard signs.

- In Report No. [100708051](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 6/15/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$1412 to the US Treasury on 6/15/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100708051](#), Ms. Fraser paid \$150 to the Washington State Democrats on 6/17/16 for “table at state convention.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100708051](#), Ms. Fraser paid \$9907 to Cerillion N4 Partners on 6/24/16 for “political consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 6/30/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$338.93 to Quinci King on 6/30/16 for “campaign assistant.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$338.08 to Heather Hendrickson on 7/2/16 for “hotel (Courtyard by Marriott) and mileage reimbursement.” Ms. Fraser failed to disclose the address of the actual vendor (i.e., Courtyard by Marriott), the exact dates of expenditure, as well as the exact amount paid to the hotel vendor and the exact amount reimbursed for the mileage.
- In Report No. [100708051](#), Ms. Fraser paid \$262.50 to Percival Consulting Group on 7/5/16 for “data management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 6/1/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100708051](#), Ms. Fraser paid \$40,333 to Cerillion N4 Partners on 7/11/16 for “ad buy.” Ms. Fraser failed to disclose the names of the media outlets, and the amounts paid to each outlet.
- In Report No. [100708051](#), Ms. Fraser made a \$93 in-kind contribution on 6/30/16 for “parking.” Ms. Fraser failed to disclose the names of the vendors, the vendors’ addresses, and the dates the parking activities took place.
- In Report No. [100708051](#), Ms. Fraser made a \$1617 in-kind contribution on 6/30/16 for “hotels.” Ms. Fraser failed to disclose the names of the hotel vendors, the vendors’ addresses, and the dates that the expenditures were made.
- In Report No. [100708051](#), Ms. Fraser made a \$411.60 in-kind contribution on 7/11/16 for “mileage 740 miles and parking.” Ms. Fraser failed to disclose the names of the parking vendors, the vendors’ addresses, the dates of parking service, and the amounts paid for the parking service.

7/12/16 to 7/25/16

- In Report No. [100712992](#), Ms. Fraser paid \$33,333 to Cerillion N4 Partners on 7/15/16 for “TV ad buy.” Ms. Fraser failed to disclose the media outlets, and the amounts paid to each outlet.
- In Report No. [100712992](#), Ms. Fraser paid \$2750 to Jessica Boad on 7/12/16 for “fundraising consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100712992](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 7/15/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100712992](#), Ms. Fraser paid \$1482.14 to the US Treasury on 7/15/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100712992](#), Ms. Fraser paid \$421.28 to Quinci King on 7/20/16 for “campaign assistant.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100712992](#), Ms. Fraser paid \$48,334 to Cerillion N4 Partners on 7/22/16 for “ads, production, consulting.” Ms. Fraser failed to disclose the media outlets, and the amounts paid to each outlet.
- In Report No. [100712992](#), Ms. Fraser paid \$69.97 to Web Network Solutions on 7/25/16 for “website.” Ms. Fraser failed to disclose the vendor’s address.

7/26/16 to 8/31/16

- In Report No. [100720565](#), Ms. Fraser paid \$53.98 to Web Network Solutions on 7/29/16 for “web network.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser paid \$84.06 to Department of Labor & Industries on 7/29/16 for “L & I tax.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 7/29/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$168.77 to Coprintco on 7/29/16 for “printing picnic postcard.” Ms. Fraser failed to disclose the quantity of postcards.
- In Report No. [100720565](#), Ms. Fraser paid \$144.72 to Tim Lancaster on 7/29/16 for “drinks and supplies for picnic – Safeway.” Ms. Fraser failed to disclose the address of the actual vendor.
- In Report No. [100720565](#), Ms. Fraser paid \$675 to Percival Consulting Group on 8/3/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.

- In Report No. [100720565](#), Ms. Fraser paid \$2750 to Jessica Boad on 8/5/16 for “fundraising consulting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$150 to Percival Consulting Group on 8/5/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$1507.44 to the US Treasury on 8/15/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser paid \$500 to Christine Garst on 8/10/16 for “accounting services.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 8/15/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$1447 to Heather Hendrickson on 8/31/16 for “campaign manager.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$920 to Percival Consulting Group on 8/31/16 for “database management.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser paid \$500 to Christine Garst on 8/31/16 for “accounting.” Ms. Fraser failed to disclose the dates the services were provided.
- In Report No. [100720565](#), Ms. Fraser received a \$100 in-kind contribution from Cheryl Selby on 7/27/16 for “t shirts.” Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser received a \$50 in-kind contribution from Paul Berendt on 7/27/16 for “t shirts.” Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser received a \$50 in-kind contribution from Wanda Riley on 7/27/16 for “t shirts.” Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser received a \$40 in-kind contribution from Michael and Theresa Murphy on 7/27/16 for “t shirts.” Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from Gary Worthington on 7/27/16 for “t shirts.” Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor’s address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from Sandra Worthington on 7/27/16 for “t shirts.” Ms. Fraser failed to

disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.

- In Report No. [100720565](#), Ms. Fraser received a \$20 in-kind contribution from Susan Herring on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from David Peeler on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from Maria Peeler on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$25 in-kind contribution from Linda Enlow on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$20 in-kind contribution from Jennifer Belcher on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$20 in-kind contribution from Tim Lancaster on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$20 in-kind contribution from Katrin Nelson on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from Zachary Smith on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$10 in-kind contribution from Megan Walsh on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$3.38 in-kind contribution from Tom Best on 7/27/16 for "t shirts." Ms. Fraser failed to disclose the quantity of T-shirts, the name of the actual T-shirt vendor, and the vendor's address.
- In Report No. [100720565](#), Ms. Fraser received a \$429.25 in-kind contribution from Georgina Willner on 8/7/16 for "stamps for thank you letters." Ms. Fraser failed to disclose the name of the actual vendor and the vendor's address.

September 2016

- In Report No. [100724753](#), Ms. Fraser paid \$1412 to the US Treasury on 9/15/16 for “payroll taxes.” Ms. Fraser failed to disclose the vendor’s address.
- In Report No. [100724753](#), Ms. Fraser paid \$64.58 to Department of Labor & Industries on 9/28/16 for “payroll tax.” Ms. Fraser failed to disclose the vendor’s address.

December 2016

- In Report No. [100739803](#), Ms. Fraser paid \$1000 to Christine Garst on 12/29/16 for “accounting fee.” Ms. Fraser failed to disclose the dates the services were provided.

4) Failure to identify committee officers (Violation of RCW 42.17A.205).

RCW [42.17A.205](#)(2)(c) requires a candidate to file a statement of organization that identifies “the names, addresses, and titles of its officers; or if it has no officers, the names, addresses, and titles of its responsible leaders.”

Ms. Fraser violated RCW 42.17A.205(2)(c) **2 times** when she failed to identify committee officers/responsible leaders in her [C1 Report](#) (and [amended C1 Report](#)).

Ms. Fraser paid a total of \$19,966 to Jessica Boad for “fundraiser,” “fundraising consulting,” or “fundraising consultant,” and \$23,152 to Heather Hendrickson for “campaign manager.”

Recipient	Report No.	Amount	Date	Description
Jessica Boad	100668649	\$1596	10/30/15	"fundraising consulting"
Jessica Boad	100675321	\$2750	12/3/15	"fundraising consulting"
Jessica Boad	100677450	\$1620	1/5/16	"fundraising consultant"
Jessica Boad	100680008	\$1000	2/3/16	"fundraiser"
Jessica Boad	100689677	\$1000	3/7/16	"fundraising consulting"
Jessica Boad	100693754	\$1000	4/13/16	"fundraiser"
Jessica Boad	100699622	\$2750	5/16/16	"fundraising consulting"
Jessica Boad	100708051	\$2750	6/6/16	"fundraising"

				consulting”
Jessica Boad	100712992	\$2750	7/12/16	“fundraising consulting”
Jessica Boad	100720565	\$2750	8/5/16	“fundraising consulting”
Heather Hendrickson	100677450 ,	\$1447	1/15/16	“campaign manager”
Heather Hendrickson	100677450	\$1447	1/29/16	“campaign manager”
Heather Hendrickson	100680008	\$1447	2/12/16	“campaign manager”
Heather Hendrickson	100680008	\$1447	2/29/16	“campaign manager”
Heather Hendrickson	100689677	\$1447	3/15/16	“campaign manager”
Heather Hendrickson	100689677	\$1447	3/31/16	“campaign manager”
Heather Hendrickson	100693754	\$1447	4/15/16	“campaign manager”
Heather Hendrickson	100693754	\$1447	4/29/16	“campaign manager”
Heather Hendrickson	100699622	\$1447	5/13/16	“campaign manager”
Heather Hendrickson	100708051	\$1447	6/1/16	“campaign manager”
Heather Hendrickson	100708051	\$1447	6/15/16	“campaign manager”
Heather Hendrickson	100708051	\$1447	6/30/16	“campaign manager”
Heather Hendrickson	100712992	\$1447	7/15/16	“campaign manager”
Heather Hendrickson	100720565	\$1447	7/29/16	“campaign manager”
Heather Hendrickson	100720565	\$1447	8/15/16	“campaign manager”
Heather Hendrickson	100720565	\$1447	8/31/16	“campaign manager”

Furthermore, Ms. Fraser’s C4 reports show expenditures made by Ms. Boad and Ms. Hendrickson for which Ms. Fraser later reimbursed them.

Recipient	Report No.	Amount	Date	Description
Jessica Boad	100708051	\$110.35	6/6/16	“Thriftway – event beverages”
Jessica Boad	100708051	\$230.36	6/6/16	“Office Depot –

				mailing supplies”
Jessica Boad	100708051	\$235	6/6/16	“USPS – stamps”
Heather Hendrickson	100680008	\$113.12	2/2/16	“reimbursement – FedEx Office – copies”
Heather Hendrickson	100680008	\$81.91	2/23/16	“FedEx Office – printing”
Heather Hendrickson	100680008	\$502.67	2/26/16	“Office Depot – printer, ink, paper, envelopes”
Heather Hendrickson	100689677	\$162.50	3/22/16	“FedEx Office – printing”
Heather Hendrickson	100689677	\$160.97	3/22/16	“Hilton Vancouver”
Heather Hendrickson	100699622	\$878.58	5/26/16	“mileage reimbursement for April and May”
Heather Hendrickson	100708051	\$338.08	7/2/16	“hotel (Courtyard by Marriott) and mileage reimbursement”

This indicates that Ms. Boad and Ms. Hendrickson held positions of responsibility in Ms. Fraser’s campaign, positions in which Ms. Boad and Ms. Hendrickson made leadership and expenditure decisions.

The above individuals should have been listed as committee officers, because they, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee, as evidenced clearly by the large sums of money expended and “reimbursed” by the Fraser campaign.

WAC 390-05-245 defines committee officer as: “...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee” .

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate,

committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

Please note: To verify these violations (or to refute them), it will be necessary to obtain and review a copy of Ms. Fraser's contracts with Ms. Boad and Ms. Hendrickson

5) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1PC form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..." In their roles as officers, these individuals doubtlessly made illegal expenditures on behalf of the committee. They may have been reimbursed later for these same expenditures (see above), but they were not listed as an officer when they made those expenditures on behalf of the Fraser campaign.

6) Failure to identify treasurer's function (Violation of RCW 42.17A.205)

RCW [42.17A.205](#)(2)(k) requires a candidate to file a statement of organization that identifies "the name, address, and title of any person who authorizes expenditures or makes decisions on behalf of the candidate. Furthermore, RCW [42.17A.205](#)(2)(l) requires "the name, address, and title of any person who is paid by or is a volunteer for a candidate . . . to perform ministerial functions on behalf of two or more candidates or committees."

In her [C1 Report](#) (and [amended C1 Report](#)), Ms. Fraser failed to state whether treasurer Christine Garst would perform only ministerial functions.

7) Intentionally filing false reports (Violation of RCW 9A.72.090).

I realize violations of this statute are outside the scope of the PDC and it's mandate, however, these violations establish a pattern of behavior and mindset which better illustrate the circumstances and mindset around the Fraser campaign.

I believe that most people running for office try their best to comply with the campaign finance laws, and that they run afoul simply because it is impossible to run a campaign in this state and **NOT** violate the law. (The laws truly are excessively complex, and it is no secret that I'd like to help reform them) What concerns me with Ms. Fraser is that she *deliberately* filed false reports. If you want to be a *lawmaker*, then it would be nice to not be a malicious *lawbreaker*.

Candidates who get into a race early, like Ms. Fraser did, will often file C3 reports frequently in the early stages of their campaign for strategic purposes. As Emily's List says, early money is like yeast: it helps raise the dough. Early money also intimidates other potential candidates from running.

For one month beginning on 10/10/15, Ms. Fraser adopted a campaign practice of immediately filing a C3 report whenever she received a contribution, depositing the contribution a few days later, and then amending the original report to show the true date of deposit. **Ms. Fraser deliberately falsified 19 reports and must be prosecuted for first-degree perjury (RCW 9A.72.020).**

While I applaud Ms. Fraser's strategic thinking in filing frequent C3 reports early in her campaign, I condemn her for falsifying reports and hope that you will, as well.

Original C3	Date of deposit	Amended C3	Date of actual deposit
100662053	10/10/15	100668631	10/13/15
100662054	10/13/15	100668632	10/20/15
100663293	10/14/15	100668633	10/21/15
100663294	10/17/15	100668634	10/23/15
100663295	10/18/15	100668635	10/26/15
100663296	10/19/15	100668636	10/26/15
100663470	10/20/15	100668637	10/27/15
100664926	10/21/15	100668638	10/28/15
100664927	10/22/15	100668639	10/28/15
100666216	10/26/15	100668640	11/2/15
100666219	10/27/15	100668643	11/3/15
100666217	10/28/15	100668641	11/4/15
100666218	10/29/15	100668642	11/5/15
100667193	10/31/15	100668644	11/6/15
100667194	11/1/15	100668645	11/6/15
100667673	11/2/15	100668646	11/9/15
100667741	11/05/15	100668647	11/10/15
100667742	11/07/15	100668648	11/12/15
100667743	11/08/15	100668775	11/13/15

8) Illegal over limit personal loan reimbursement (violation of RCW 42.17A.445).

Per **RCW 42.17A.445(3)** and **WAC 390-05-400**, a campaign may reimburse a candidate for loans made to his or her own campaign. The reimbursement limit for such loans made after 2/28/16 is \$6000.

Ms. Fraser loaned her campaign \$30,000 on 7/14/16 and \$40,000 on 7/19/16 (see Report No. [100712992](#)). Ms. Fraser's campaign reimbursed \$22,272.23 to her on 1/9/17 (see Report No. [100747083](#)), which exceeds the reimbursement limit by \$16,272.23. **Ms. Fraser is in clear violation of RCW 42.17A.445 and WAC 390-05-400, and must return the \$16,272.23 to her campaign for legal disposal.**

9) Illegal in-kind donation/expenditure (Violation of RCW 42.17A.430).

RCW [42.17A.430](#)(8) states, "No candidate or authorized committee may transfer funds to any other candidate or other political committee."

In Report No. [100689677](#), Ms. Fraser made a \$250 in-kind contribution on 3/9/16 for "donation to Washington State Democrats." This is a violation of **RCW 42.17A.430(8)**.

The PDC should investigate the possibility that Karen Fraser committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan