



State of Washington

PUBLIC DISCLOSURE COMMISSION

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To: Members, Public Disclosure Commission

From: Kurt Young, PDC Compliance Officer

Subject: Memorandum to the Commission concerning the Complaint against American Federation of State, County and Municipal Employees, AFL-CIO; PDC Case 54145

Date: September 17, 2019

Background. Complaint and Allegations

- American Federation of State, County and Municipal Employees, AFL-CIO (AFSCME) is the nation's largest services employees' union with 3,400 local unions, 58 councils and affiliates in 46 states, and approximately 1.4 million members in the United States according to its website. The AFSCME - Special Account named in the complaint is registered with the Internal Revenue Service as a 527 political organization.
- Between November 10, 2008, to September 10, 2018, AFSCME filed a total of 16 Out-of-State Committee Contributions reports (C-5 reports) disclosing AFSCME expenditures and contributions of more than \$50 made in support of or opposition to any Washington State candidate or ballot proposition. The C-5 reports listed the AFSCME's mailing address for the C-5 report as 1625 L Street NW, Washington DC, 20036.
- On July 3, 2019, Maxford Nelson on behalf of The Freedom Foundation filed a complaint with the Public Disclosure Commission against AFSCME alleging violations of: (1) RCW 42.17A.250 by failing to timely file Out-of-State Committee Contribution Reports (C-5 reports) disclosing monetary contributions made to political committees in Washington State during calendar years 2015 and 2016; and (2) RCW 42.17A.255, .260, and .305 by failing to timely and accurately file Independent Expenditures reports (C-6 reports) disclosing independent expenditures in support of or opposition to any candidate or ballot proposition, and/or electioneering communications featuring or mentioning candidates for public office. **See Exhibit 1.**
- AFSCME has no prior PDC violations.

Staff Findings

1. RCW 42.17.A.250 requires political committees registered and reporting in another state or in the District of Columbia, to file a monthly Out-of-State Committee Contribution Report (C-5 report) by the 10th of the month following any month in which the committee made contributions or other expenditures of more than \$50 to support or oppose a Washington State candidate or political committee.
2. In addition, the committee must also disclose on the C-5 report any contributions received above \$25 from a person in Washington and contributions received of more than \$2,680 from persons residing or corporations based outside of Washington State in the current calendar year.
3. During the period September 30, 2014 through December 31, 2018, AFSCME filed the following C-5 reports disclosing contribution and expenditure activities undertaken in support of or opposition to Washington State candidates and political committees (**See Exhibit 2**):
 - On November 10, 2014, AFSCME timely filed a C-5 report for October 2014 disclosing a \$40,000 contribution was made on October 10, 2014 to Real Representation in the 35th, an independent expenditure/electioneering communications political committee registered with the PDC. The C-5 report did not disclose any contributions received of more than \$25 by AFSCME from Washington residents or corporations (Section 11 of the C-5 report), or any contributions received of more than \$2,680 from an out-of-state person or corporation (Section 12 of the C-5 report).
 - On August 10, 2015, AFSCME timely filed a C-5 report for July 2014 disclosing a \$100,000 contribution was made on July 29, 2015 to the Washington State Democrats. The C-5 report did not disclose any contributions received of more than \$25 by AFSCME from Washington residents or corporations, or any contributions received of more than \$2,680 from an out-of-state person or corporation.
 - On January 11, 2016, AFSCME timely filed a C-5 report for December 2015 disclosing two \$100,000 contributions totaling \$200,000 that were made on December 4 and December 16, 2015 respectively, both to the Washington State Democrats. The C-5 report did not disclose any contributions of more than \$25 received by AFSCME from Washington residents or corporations, or any contributions received of more than \$2,680 from an out-of-state person or corporation.
 - On September 10, 2018, AFSCME timely filed a C-5 report for August 2018 disclosing a \$200,000 contribution was made on August 28, 2018 to New Directions PAC, a continuing independent expenditure/electioneering communications political committee registered with the PDC. The C-5 report did not disclose any contributions received of more than \$25 by AFSCME from Washington residents or corporations, or any contributions received of more than \$2,680 from an out-of-state person or corporation.
4. On August 14, 2019, AFSCME filed seven C-5 reports, three initial C-5 reports, and four amended C-5 reports.

5. All of the C-5 reports filed disclosed AFSCME's mailing address as 1625 L Street NW, Washington DC, 20036, listed Elissa McBride as Secretary/Treasurer, and that AFSCME was a separate segregated fund to support state and local candidates and committees nationwide. The C-5 reports also disclosed AFSCME had registered political committees in Alaska, California, Colorado, the District of Columbia, Hawaii, Massachusetts, New Jersey, Tennessee, and West Virginia.

Initial late filed C-5 Reports submitted by AFSCME:

August 2015 C-5 report:

- AFSCME filed a C-5 report for August 2015 disclosing a \$25,000 contribution was made on August 26, 2015, to AFSCME Washington Council 2 in Everett, Washington, and listing the purpose as "Grant to an affiliate". **See Exhibit 3.** The C-5 report was required by the Committee to have been filed no later than September 10, 2015, and the \$25,000 contribution was disclosed 1,434 days late.

The C-5 report also disclosed that AFSCME received 19 different contributions from AFSCME International from January 1 through August 31, 2015, totaling \$1,645,782 for transfers made from AFSCME International into AFSCME's segregated account.

October 2015 C-5 report:

- AFSCME filed a C-5 report for October 2015 disclosing a \$25,000 contribution was made on October 16, 2015, to AFSCME Washington Council 2 in Everett, Washington, and listing the purpose as "Grant to an affiliate". **See Exhibit 4.** The C-5 report was required by the Committee to have been filed no later than November 10, 2015, and the \$25,000 contribution was disclosed 1,373 days late.

The C-5 report also disclosed that AFSCME received 40 different contributions from AFSCME International from January 1 through October 30, 2015, totaling \$4,048,569 for transfers made from AFSCME International into AFSCME's segregated account.

September 2016 C-5 report:

- AFSCME filed a C-5 report for September 2016 disclosing a \$200,000 contribution was made on September 9, 2016, to AFSCME Washington Council 28 in Olympia, Washington and listing the purpose as "Grant to an affiliate". **See Exhibit 5.** The C-5 report was required by the Committee to have been filed no later than October 10, 2016, and the \$200,000 contribution was disclosed 1,038 days late.

The C-5 report also disclosed that AFSCME received 70 different contributions from AFSCME International from January 1 through September 30, 2016, totaling \$19,918,861 for transfers made from AFSCME International into AFSCME's segregated account.

Amended C-5 Reports late filed by AFSCME (See Exhibit 6):

October 2014 C-5 report:

- AFSCME filed an amended C-5 report for October 2014 disclosing the same \$40,000 contribution made October 10, 2014, that was previously timely disclosed as made to Real Representation in the 35th, an independent expenditure/electioneering communications political committee registered with the PDC.

The amended information disclosed on the C-5 report included two and one-half pages of different contributions from AFSCME International from January 1 through October 31, 2014, totaling \$29,368,240 (transfers from AFSCME International into AFSCME segregated account).

The amended C-5 report disclosed contributions from AFSCME International that were required to be reported in 2014. PDC staff noted that only \$40,000 of the \$29,368,240 in total contributions received from AFSCME International in 2014 was spent in Washington, and that AFSCME had political committees registered and reporting in Alaska, California, Colorado, the District of Columbia, Hawaii, Massachusetts, New Jersey, Tennessee, and West Virginia.

July 2015 C-5 report:

- AFSCME filed an amended C-5 report for July 2015 disclosing the same \$100,000 contribution made July 29, 2015, that was previously timely disclosed as made to the Washington State Democrats. The amended information disclosed on the C-5 report included 17 different contributions had been received from AFSCME International from January 1 through July 28, 2015, totaling \$1,345,757 (transfers from AFSCME International into AFSCME segregated account).

The amended C-5 report disclosed contributions from AFSCME International that were required to be reported in 2015. PDC staff noted that \$100,000 of the \$1,345,757 in total contributions received from AFSCME International in 2015 was spent in Washington, and AFSCME had political committees registered and reporting in Alaska, California, Colorado, the District of Columbia, Hawaii, Massachusetts, New Jersey, Tennessee, and West Virginia.

December 2015 C-5 report:

- AFSCME filed an amended C-5 report for December 2015 disclosing the same two \$100,000 contributions made December 4 and December 16, 2015 respectively, that were previously timely disclosed as made to the Washington State Democrats. The amended information disclosed on the C-5 report included two and one-half pages of different contributions that had been received from AFSCME International from January 1 through December 31, 2015, totaling \$7,485,733.

The Amended C-5 report disclosed contributions from AFSCME International that were required to have been disclosed in 2015.

PDC staff noted that \$350,000 of the \$7,485,733 in total contributions received from AFSCME International in 2015 was spent in Washington, and AFSCME had political committees registered and reporting in Alaska, California, Colorado, the District of Columbia, Hawaii, Massachusetts, New Jersey, Tennessee, and West Virginia.

August 2018 C-5 report:

- AFSCME filed an amended C-5 report for August of 2018 disclosing the same \$200,000 contribution made August 28, 2018, to New Directions PAC, that was previously timely disclosed on the initial C-5 report. The amended information disclosed on the C-5 report included two and pages of different contributions that had been received from AFSCME International for the period January 1 through August 31, 2018, totaling \$14,232,354 (transfers from AFSCME International into AFSCME segregated account).

The amended C-5 report disclosed contributions from AFSCME International that were required to be reported in 2018. PDC staff noted that only \$200,000 of the \$14,232,354 in total contributions received from AFSCME International in 2018 were spent in Washington, and that AFSCME had political committees registered and reporting in Alaska, California, Colorado, the District of Columbia, Hawaii, Massachusetts, New Jersey, Tennessee, and West Virginia.

6. On September 3, 2019, AFSCME filed four amended C-5 reports disclosing the same contribution and expenditure information as on the initial C-5 reports, with the only change being in Section 2 on each report concerning the amended and initial filings.

Response:

7. On August 5, 2019, Danielle Franco-Malone, an attorney with Barnard, Iglitzin & Lavitt, LLP and legal counsel for AFSCME provided a response to the allegations listed in the complaint. **See Exhibit 7.** Ms. Franco-Malone stated the following:
 - The complaint alleged AFSCME failed to file C-6 reports disclosing independent expenditures, and while AFSCME “hired Hopkins & Sachs, Inc. and Cerillion N4 Partners to produce communications,” she stated those communications were related to candidates for public offices in other states such as Michigan, Minnesota, Oregon, and Wisconsin. Since no Washington candidates or ballot propositions were supported or opposed by the communications, no C-6 report was required to have been filed by AFSCME.
 - As noted earlier, AFSCME’s Special Account is an IRS 527 separate segregated fund that is “a legally distinct entity for purposes of the Internal Revenue Code, it is entirely controlled by AFSCME, all decisions regarding its activities are made by AFSCME, and it is entirely funded by AFSCME.” She stated that AFSCME’s Special Account is “an AFSCME bank account used and funded by AFSCME for AFSCME’s own political activities.”
 - The vast majority of AFSCME funds deposited into its segregated account “were not intended for electoral spending in Washington State and in fact were not used for political spending in Washington State.”

- The complaint alleged that AFSCME failed to disclose \$81,293,134 in contributions it made into its segregated fund for calendar years 2014-2018, and the during that same time, AFSCME spent \$790,000 of the AFSCME contributions were spent in Washington State, which is less than one percent. She added “In other words, more than 99% of the deposits AFSCME made into its Special Account during the pertinent time period from 2014-2018 had nothing to do with electoral spending in Washington State.”

Scope

PDC staff reviewed the following:

- The complaint and exhibits filed July 3, 2019 by Maxford Nelson with The Freedom Foundation against AFSCME.
- Telephone conversations and email communications between PDC staff and Danielle Franco-Malone, legal counsel representing AFSCME.
- The PDC contribution and expenditure database for AFSCME contributions made for a portion of calendar year 2014 to present.
- The previously filed C-5 reports submitted by AFSCME.

Statutes and Rules

RCW 42.17.A.250 requires political committees registered and reporting in another state or in the District of Columbia, to file a monthly Out-of-State Committee Contribution Report (C-5 report) by the 10th of the month following any month in which the committee made contributions or other expenditures of more than \$50 to support or oppose a Washington State candidate or political committee. The committee must also disclose on the C-5 report any contributions received above \$25 from a person in Washington State, and contributions of more than \$2,680 received from persons or corporations residing outside of Washington State in the current calendar year.

WAC 390-16-049 states in part that: (1) RCW 42.17A.250 governs campaign reporting in Washington state by committees located outside of Washington. The committee begins reporting when it makes an expenditure supporting or opposing a Washington state candidate or political committee.

(2) To file as an out-of-state political committee, all the criteria in (a) and (b) of this subsection must be satisfied:

(a) Out-of-state. First, the committee must be located out-of-state. It must maintain its office or headquarters in another U.S. state or the District of Columbia, and have no office, street address or corporate registered agent in Washington state.

(b) Organizational purpose and campaign activities. Second, the committee must also be currently organized primarily for engaging in campaign activities in another state.

Report to Commission: List of Exhibits

- Exhibit #1** July 3, 2019 complaint filed by Maxford Nelson with the Freedom Foundation against American Federation of State, County and Municipal Employees - Special Account. (Note – the complaint and appendix with exhibits is a total of 523 page, only the 15-page complaint is included as Exhibit #1)
- Exhibit #2** Four C-5 reports timely filed by AFSCME during the period September 30, 2014 through December 31, 2018.
- Exhibit #3** August 14, 2019, late filed C-5 report submitted by AFSMCE for August of 2015.
- Exhibit #4** August 14, 2019, late filed C-5 report submitted by AFSMCE for October of 2015.
- Exhibit #5** August 14, 2019, late filed C-5 report submitted by AFSMCE for September of 2016.
- Exhibit #6** August 14, 2019, four Amended C-5 reports were submitted by AFSMCE for calendar years 2014, 2015 and 2018.
- Exhibit #7** August 5, 2019, response submitted by Danielle Franco-Malone, legal counsel on behalf of her client, AFSMCE.

July 3, 2019

Public Disclosure Commission
711 Capitol Way S. #206
P.O. Box 40908
Olympia, WA 98504

Public Disclosure Commission Staff,

In accordance with RCW 42.17A.755(1) and RCW 42.17A.775, I would like to bring to your attention significant violations of the Fair Campaign Practices Act (“FCPA”), Chapter 42.17A RCW, by the American Federation of State, County and Municipal Employees (“AFSCME”).

Based in Washington, D.C., AFSCME is a national labor union with affiliates around the country, including in Washington state. It maintains a fund called the “Special Account,” which is a “political organization” for the purposes of 26 U.S.C. § 527 and federal tax law. *See Appendix page 506*, a copy of the most recent form 8872 the Special Account filed with the Internal Revenue Service (“IRS”).

Since at least 2008, the Special Account has periodically filed forms C5 with the Public Disclosure Commission (“PDC”) as an out-of-state political committee, though it does so simply under the name, “American Federation of State, County and Municipal Employees.”¹

In brief, while AFSCME/the Special Account disclosed \$540,000 in political expenditures it made in Washington on C5 forms, it has repeatedly violated RCW 42.17A.250 by failing to disclose at least three expenditures totaling \$250,000. The Special Account further violated RCW 42.17A.250 by failing to disclose the identity of any of the contributors whose money it used to make its \$790,000 in political expenditures in Washington. Its lack of disclosure involved at least 401 contributions from eight out-of-state donors totaling \$81,293,134 over four years. Finally, the Special Account purchased at least \$272,764 in political mail and digital advertising from two Washington state vendors without disclosing any independent expenditures or electioneering activity on C6 forms, possibly in violation of RCW 42.17A.255.

Applicable Statutes and Regulations

RCW 42.17A.250 specifies the reporting requirements for out-of-state political committees:

¹ Its most recently filed C5 form lists Elissa McBride as the only officer of the Special Account. Her contact information is listed as: 1625 L Street NW, Washington, D.C., 20036, (202) 429-1088, chui@afscme.org. Its most recently filed 8872 form also indicates Ms. McBride is the “custodian of records” for the Special Account, but the form lists Selma Golding as the “contact person.” Ms. Golding’s contact information is listed as: 1625 L Street NW, Washington, D.C., 20036, sgolding@afscme.org, (202) 429-1000.

“(1) An out-of-state political committee organized for the purpose of supporting or opposing candidates or ballot propositions in another state that is not otherwise required to report under RCW 42.17A.205 through 42.17A.240 shall report as required in this section when it makes an expenditure supporting or opposing a Washington state candidate or political committee. The committee shall file with the commission a statement disclosing:

- (a) Its name and address;
- (b) The purposes of the out-of-state committee;
- (c) The names, addresses, and titles of its officers or, if it has no officers, the names, addresses, and the titles of its responsible leaders;
- (d) The name, office sought, and party affiliation of each candidate in the state of Washington whom the out-of-state committee is supporting or opposing and, if the committee is supporting or opposing the entire ticket of any party, the name of the party;
- (e) The ballot proposition supported or opposed in the state of Washington, if any, and whether the committee is in favor of or opposed to that proposition;
- (f) The name and address of each person residing in the state of Washington or corporation that has a place of business in the state of Washington who has made one or more contributions in the aggregate of more than *twenty-five dollars to the out-of-state committee during the current calendar year, together with the money value and date of the contributions;
- (g) The name, address, and employer of each person or corporation residing outside the state of Washington who has made one or more contributions in the aggregate of more than *two thousand five hundred fifty dollars to the out-of-state committee during the current calendar year, together with the money value and date of the contributions. Annually, the commission must modify the *two thousand five hundred fifty dollar limit in this subsection based on percentage change in the implicit price deflator for personal consumption expenditures for the United States as published for the most recent twelve-month period by the bureau of economic analysis of the federal department of commerce;
- (h) The name and address of each person in the state of Washington to whom an expenditure was made by the out-of-state committee with respect to a candidate or political committee in the aggregate amount of more than *fifty dollars, the amount, date, and purpose of the expenditure, and the total sum of the expenditures; and
- (i) Any other information as the commission may prescribe by rule in keeping with the policies and purposes of this chapter.

(2) Each statement shall be filed no later than the tenth day of the month following any month in which a contribution or other expenditure reportable under subsection (1) of this section is made. An out-of-state committee incurring an obligation to file additional statements in a calendar year may satisfy the obligation by timely filing reports that supplement previously filed information.”

The corresponding regulation governing out-of-state political committees is WAC 390-16-049, which establishes out-of-state political committees are to disclose their contributions and expenditures on forms C5.

Additionally, RCW 42.17A.255 governs the disclosure of independent expenditures, providing:

“(1) For the purposes of this section the term ‘independent expenditure’ means any expenditure that is made in support of or in opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.220, 42.17A.235, and 42.17A.240...

(2) Within five days after the date of making an independent expenditure that by itself or when added to all other such independent expenditures made during the same election campaign by the same person equals one hundred dollars or more, or within five days after the date of making an independent expenditure for which no reasonable estimate of monetary value is practicable, whichever occurs first, the person who made the independent expenditure shall file with the commission an initial report of all independent expenditures made during the campaign prior to and including such date.

(3) At the following intervals each person who is required to file an initial report pursuant to subsection (2) of this section shall file with the commission a further report of the independent expenditures made since the date of the last report:

- (a) On the twenty-first day and the seventh day preceding the date on which the election is held; and
- (b) On the tenth day of the first month after the election; and
- (c) On the tenth day of each month in which no other reports are required to be filed pursuant to this section. However, the further reports required by this subsection (3) shall only be filed if the reporting person has made an independent expenditure since the date of the last previous report filed.

The report filed pursuant to paragraph (a) of this subsection (3) shall be the final report, and upon submitting such final report the duties of the reporting person shall cease, and there shall be no obligation to make any further reports.

(4) All reports filed pursuant to this section shall be certified as correct by the reporting person.

(5) Each report required by subsections (2) and (3) of this section shall disclose for the period beginning at the end of the period for the last previous report filed or, in the case of an initial report, beginning at the time of the first independent expenditure, and ending not more than one business day before the date the report is due:

- (a) The name and address of the person filing the report;
- (b) The name and address of each person to whom an independent expenditure was made in the aggregate amount of more than fifty dollars, and the amount, date, and purpose of each such expenditure. If no reasonable estimate of the monetary value of a particular independent expenditure is practicable, it is sufficient to report instead a precise description of services, property, or rights furnished through the expenditure and where appropriate to attach a copy of the item produced or distributed by the expenditure;
- (c) The total sum of all independent expenditures made during the campaign to date; and
- (d) Such other information as shall be required by the commission by rule in conformance with the policies and purposes of this chapter.”

PDC regulations found in WAC 390-16-058, 059, 060, and 063 further clarify the reporting obligations and requirements for independent expenditures and electioneering communications, directing that they be disclosed on forms C6.

Allegations

AFSCME has filed four forms C5 during the five-year statute of limitations established by RCW 42.17A.770. Together, they disclose five expenditures to political committees in Washington totaling \$540,000. *See App. 2-9*, copies of the C5 forms filed by AFSCME’s Special Account.

AFSCME Special Account Disclosed Expenditures in WA 2014-18			
Recipient	Amount	Expenditure Date	C5 Filed Date
Real Representation in the 35th	\$40,000	10/10/2014	11/6/2014
Washington State Democrats	\$100,000	7/29/2015	8/5/2015
Washington State Democrats	\$100,000	12/4/2015	1/11/2016
Washington State Democrats	\$100,000	12/16/2015	
New Direction PAC	\$200,000	8/28/2018	9/7/2018
Total	\$540,000		

1. Failure to report expenditures on forms C5.

In addition to the five disclosed expenditures above, forms 8872 filed by AFSCME for the Special Account with the IRS indicate it made at least three additional political expenditures in 2015 and 2016 to entities in Washington state that were *not* disclosed to the PDC on C5 forms.

AFSCME Special Account Unreported Expenditures in WA 2014-18		
Recipient	Amount	Expenditure Date
AFSCME Washington Council 2	\$25,000	8/25/2015
AFSCME Washington Council 2	\$25,000	11/24/2015
AFSCME Washington Council 28	\$200,000	9/9/2016
Total	\$250,000	

See App. 329, 336, and 367, copies of the forms 8872 disclosing the above expenditures.

a. Contributions to WSCCCE

The political committee operated by the Washington State Council of County and City Employees/AFSCME Council 2 (“WSCCCE”) reported receipt of the two \$25,000 contributions from the Special Account in 2015 on C3 forms filed with the PDC. *See App. 10-11*, copies of WSCCCE’s forms C3.

AFSCME should have disclosed the first \$25,000 expenditure to WSCCCE’s political committee on a form C5 submitted on or before September 10, 2015. It should have disclosed the second expenditure to WSCCCE’s political committee on a form C5 submitted on or before December 10, 2015. Not only did AFSCME fail to file such forms, but it actually omitted these expenditures from the form C5 it filed with the PDC on January 11, 2016. *See App. 6-7*.

b. Contribution to WFSE

The Washington Federation of State Employees/AFSCME Council 28 (“WFSE”) did not disclose to the PDC receipt of the \$200,000 contribution it received from the Special Account in 2016 because it is not registered as a political committee. However, if the contribution from the Special Account was intended to finance and did finance electoral political activity by WFSE — which expends substantial funds on such activity, maintains a 527 political organization for federal tax purposes, and may have been operating at the time as an unregistered political committee — then AFSCME should have disclosed the Special Fund’s expenditure on a form C5 filed before October 10, 2016. No such form was ever filed.

Moreover, significant evidence indicates the \$200,000 contribution to WFSE was intended for electoral political activity.

First, by definition, the purpose of a “political organization” such as the Special Account is to “directly or indirectly accept[] contributions or [make] expenditures” “to influence the... election... of any individual to any Federal, State, or local public office...”²

Second, AFSCME described the purpose of the Special Account to the IRS as “support[ing] political parties and various candidates for election to public office.” See **App. 12**, a copy of the Special Account’s 2016 form 990 submitted to the IRS.³

Lastly, the Special Account’s 2016 form 990 indicated its total expenses for the year were \$30,400,763 (Part IX, Line 25). See **App. 21**. On the same form, the Special Account indicated its “political campaign activities” for the year totaled just \$350 less than its overall expenses — \$30,400,413 (Schedule C, Part I-A, Line 2). See **App. 25**.

Because all of the \$200,000 cannot be included in \$350 not spent on political campaigns, the Special Account clearly indicates the \$200,000 was for political campaign activity.

IRS directions define “political campaign activities” as “[a]ll activities that support or oppose candidates for elective federal, state, or local public office.” See **App. 159**, a copy of the IRS directions for completing its 2016 form 990. The Special Account itself describes the nature of its “political campaign activities” as “support[ing] political parties and various candidates for election to public office” (see the description required for Schedule C, Part I-A, Line 1 provided in Schedule C, Part IV). See **App. 27**. As such, these activities fall within those Washington state requires a political committee report.

In short, unless AFSCME provided false information to the IRS under penalty of perjury, all but \$350 of the Special Fund’s 2016 expenditures went towards electing

² See 26 U.S.C. § 527(e)(1), (2).

³ See Part I, Line 1.

candidates for office, including the \$200,000 expenditure it made to WFSE, which the Special Fund should have disclosed on a form C5.

2. Failure to report contributions on forms C5.

AFSCME's Special Account has failed to disclose receipt of hundreds of contributions totaling \$81.3 million it has received from multiple out-of-state donors. In so doing, it has failed to disclose the source of the \$790,000 it expended to influence Washington elections.

On all four of the Special Account's filed C5 forms, both item 11, "contributions received from Washington residents," and item 12, "contributions received from persons residing outside of Washington," are left entirely blank. *See App. 2-9.* Further, AFSCME never filed a form C5 for 2016 despite its \$200,000 expenditure to WFSE on September 9. In short, AFSCME failed to disclose the source of *any* of the funds it used to influence Washington elections.

Theoretically, it could be possible that contributors to the Special Account all fell under the reporting thresholds requiring the itemization of contributions — \$25 for contributions from Washington residents and \$2,645-\$2,680 for contributions from persons residing outside Washington.

However, such is not the case in this instance.

Forms 8872 for the Special Account filed by AFSCME with the IRS indicate it received millions of dollars in contributions from multiple persons outside Washington well above the threshold necessary for disclosure. *See App. 195-204*, a list of contributions to the Special Account listed on its 8872 forms that should have been disclosed on C5 forms. These 8872 forms also record the five expenditures made by the Special Account for political activity in Washington that were disclosed on its forms C5.

- a. AFSCME's November 6, 2014 C5 should have disclosed all contributors residing outside Washington that had contributed more than \$2,645 in 2014. While the C5 disclosed no such contributors, AFSCME's forms 8872 indicate it received \$37,823,157 in reportable contributions to the Special Account, including:
 - A \$5,000 contribution from Friends of Noam Bramson;
 - A \$46,000 contribution from Californians for Voter Turnout;
 - A \$50,000 contribution from the Committee for Working Families; and,
 - 165 contributions from AFSCME International totaling \$37,722,157.

See App. 205-299, the forms 8872 including the contributions above.

- b. Similarly, AFSCME's August 5, 2015 C5 failed to disclose \$1,391,756 in reportable contributions, including:
 - A \$21,000 contribution from Michigan for All;
 - A \$25,000 contribution from the Democratic Party of Hawaii;

- 17 contributions from AFSCME International totaling \$1,345,756.

See App. 303-341, the forms 8872 including the contributions above.

- c. AFSCME's January 11, 2016 C5 should have, but did not, disclose \$6,148,476 in reportable contributions, including:

- An \$8,500 contribution from Ed Hernandez for Senate 2018; and,
- 35 contributions from AFSCME International totaling \$6,139,976.

See App. 316-341, the form 8872 including the contributions above.

- d. AFSCME should have filed a C5 form no later than October 10, 2016 disclosing its \$200,000 expenditure to WFSE and 72 contributions received by the Special Account from AFSCME International totaling \$21,685,781. *See App. 342-385*, the forms 8872 including the contributions above.

- e. Lastly, AFSCME's September 7, 2018 C5 form should have disclosed the following contributions of \$14,243,964 from contributors outside Washington who gave more than \$2,680 in the aggregate to the Special Account:

- An \$11,609 contribution from AFSCME SEIU Florida; and,
- 105 contributions from AFSCME International totaling \$14,232,355.

See App. 4011-475, the forms 8872 including the contributions above.

All told, in 2014, 2015, 2016 and 2018, AFSCME failed to disclose 401 contributions from eight out-of-state contributors totaling \$81,293,134, leaving Washingtonians unable to account for the sources of the \$790,000 the Special Account spent on Washington elections during that same period.

3. Failure to disclose independent expenditures on C6 forms.

Neither AFSCME nor the Special Account have filed any C6 forms with the PDC since 2014 disclosing independent expenditures or electioneering communications. However, the forms 8872 filed with the IRS by AFSCME indicate the Special Account made multiple expenditures in 2018 to two vendors in Washington for political services: Hopkins & Sachs, Inc. and Cerillion N4 Partners, both based in Seattle.⁴

⁴ CN4 Partners, 500 Union Street, Suite 909, Seattle, WA 98101, (206) 423-0120, info@cerillionN4.com. Hopkins & Sachs, 600 North 36th Street, Suite 428, Seattle, WA 98103, (206) 632-0611, hiram@hopkinssachs.com, jim@hopkinssachs.com.

AFSCME Special Account Unreported IEs in WA 2018			
Vendor	Amount	Expenditure Date	Expenditure Purpose
Hopkins & Sachs, Inc.	\$50,137	9/18/2018	Mailing Pieces
Hopkins & Sachs, Inc.	\$36,250	9/28/2018	Mailing Pieces
Hopkins & Sachs, Inc.	\$20,114	10/5/2018	Mailing Pieces
Hopkins & Sachs, Inc.	\$19,931	10/18/2018	Mailing Pieces
Hopkins & Sachs, Inc.	\$25,864	10/24/2018	Mailing Pieces
Cerillion N4 Partners	\$38,855	10/29/2018	Digital Ads
Hopkins & Sachs, Inc.	\$5,946	10/30/2018	Mailing Pieces
Cerillion N4 Partners	\$17,528	11/2/2018	Digital Ads
Cerillion N4 Partners	\$22,527	11/2/2018	Digital Ads
Cerillion N4 Partners	\$20,353	11/8/2018	Digital Ads
Cerillion N4 Partners	\$15,259	11/8/2018	Digital Ads
Total	\$272,764		

See App. 436-503, the forms 8872 listing the above expenses.

If any of the mail pieces or digital ad campaigns purchased by the Special Account from these Washington state vendors went to support or oppose candidates or ballot measures in Washington state, it should have been disclosed to the PDC by the Special Account as independent expenditures and/or electioneering communications on forms C6.

Factors Affecting Penalty

As outlined below, nearly all of the factors spelled out in RCW 42.17A.750(1)(d) for courts to consider when assessing civil penalties for violations of the FCPA work against AFSCME/the Special Account.

RCW 42.17A.750(1)(d)	Applicability to AFSCME/Special Account
(i) The respondent's compliance history, including whether the noncompliance was isolated or limited in nature, indicative of systematic or ongoing problems, or part of a pattern of violations by the respondent, resulted from a knowing or intentional effort to conceal, deceive or mislead, or from collusive behavior, or in the case of a political committee or other entity, part of a pattern of violations by the respondent's officers, staff, principal decision makers, consultants, or sponsoring organization;	Far from being "isolated or limited" in nature, AFSCME's violations spanned the course of several years and election cycles and involved consistent failure to disclose contributions and expenditures. Available documentation does not prove AFSCME's violations were intentional, though additional investigation may reveal this to be the case. Regardless, the violations were certainly "systematic and ongoing."

<p>(ii) The impact on the public, including whether the noncompliance deprived the public of timely or accurate information during a time-sensitive period or otherwise had a significant or material impact on the public;</p>	<p>AFSCME’s failure to disclose certain expenditures and all contributions to the Special Account clearly deprived the public of timely and accurate information. Three of the four C5 forms AFSCME filed involved expenditures made in the months immediately prior to primary or general elections in 2014 and 2018, both major election years. Two of the three expenditures that were not disclosed took place within the months immediately preceding primary and general elections. At least these violations, and potentially others, occurred during a “time-sensitive period.”</p>
<p>(iii) Experience with campaign finance law and procedures or the financing, staffing, or size of the respondent's campaign or organization;</p>	<p>The Special Account is a Section 527 “political organization” under federal tax law. Its sole purpose is to engage in political activity at the state and local level. It is operated by professional staff of one of the largest labor unions in the country. The national AFSCME had total annual receipts of nearly \$200 million and a paid staff of nearly 500, according to its form LM-2 filed with the U.S. Department of Labor for calendar year 2018. If the Special Account does not have the necessary experience, financing, staffing or sophistication to comply with the FCPA, no one does.</p>
<p>(iv) The amount of financial activity by the respondent during the statement period or election cycle;</p>	<p>In 2014, 2015, 2016 and 2018, the Special Account received \$109 million in contributions and made \$107 million in expenditures. This is an exceptional amount of money by any measurement.</p>
<p>(v) Whether the late or unreported activity was within three times the contribution limit per election, including in proportion to the total amount of expenditures by the respondent in the campaign or statement period;</p>	<p>AFSCME failed to report the Special Account’s receipt of more than 400 contributions totaling more than \$80 million and failed to disclose \$250,000 in expenditures, substantial sums by any measurement and many factors beyond any contribution limits set in the FCPA.</p>
<p>(vi) Whether the respondent or any person benefited politically or economically from the noncompliance;</p>	<p>AFSCME likely benefitted politically from the noncompliance and may also have benefitted economically by obscuring from its members the extent of its use of their dues for political expenditures.</p>
<p>(vii) Whether there was a personal emergency or illness of the respondent or member of his</p>	<p>Not applicable to AFSCME in this instance.</p>

or her immediate family;	
(viii) Whether other emergencies such as fire, flood, or utility failure prevented filing;	Not applicable to AFSCME in this instance.
(ix) Whether there was commission staff or equipment error, including technical problems at the commission that prevented or delayed electronic filing;	Not applicable to AFSCME in this instance.
(x) The respondent's demonstrated good-faith uncertainty concerning commission staff guidance or instructions;	Not applicable to AFSCME in this instance.
(xi) Whether the respondent is a first-time filer;	Not applicable to AFSCME, which has filed forms C5 with the PDC as an out-of-state political committee since at least 2008.
(xii) Good faith efforts to comply, including consultation with commission staff prior to initiation of enforcement action and cooperation with commission staff during enforcement action and a demonstrated wish to acknowledge and take responsibility for the violation;	The Freedom Foundation is unaware if AFSCME has previously consulted with PDC staff though, if so, it has not resulted in anything resembling compliance.
(xiii) Penalties imposed in factually similar cases; and	<p>In PDC Case No. 42719, the PDC imposed a \$40,000 penalty on UFCW Local 21's PAC for failing to report about \$250,000 in contributions and expenditures made over the course of 2017.</p> <p>The Spokane County Democrats faced an \$83,000 penalty as a result of litigation brought by the Attorney General for failure to timely disclose \$104,190 in contributions and \$110,554 in expenditures.⁵</p> <p>The King County Democrats faced a \$36,797 penalty as a result of litigation brought by the Attorney General for failure to timely disclose \$65,442 in expenditures and \$74,261 in contributions in 2016.⁶</p> <p>In the case at hand, AFSCME completely</p>

⁵ Washington State Office of the Attorney General. "Spokane County Democrats to pay nearly \$50,000 over campaign finance violations." December 24, 2018. <https://www.atg.wa.gov/news/news-releases/spokane-county-democrats-pay-nearly-50000-over-campaign-finance-violations>

⁶ Washington State Office of the Attorney General. "AGO files campaign finance complaint against King County Democratic Central Committee." May 12, 2017. <https://www.atg.wa.gov/news/news-releases/ago-files-campaign-finance-complaint-against-king-county-democratic-central>

Washington State Office of the Attorney General. "Enforcement of Campaign Finance Laws." <https://www.atg.wa.gov/enforcement-campaign-finance-laws>

	failed to disclose \$81 million in contributions received over the course of 2014, 2015, 2016 and 2018 that it used to make \$790,000 in expenditures in Washington.
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Enforcement Options

RCW 42.17A.755(1) provides that, when presented with a citizen complaint, the PDC “must” either: (1) dismiss it or otherwise resolve it as a remedial or technical violation; (2) initiate an investigation, conduct hearings and take enforcement action; or, (3) refer the complaint to the attorney general.

1. The PDC should not dismiss the complaint as the allegations are not “obviously unfounded or frivolous.”

WAC 390-37-005(2)(a) and WAC 390-37-060 provide the PDC may dismiss a complaint if it is “obviously unfounded or frivolous, or outside of the PDC’s jurisdiction.”

There should be no disputing the PDC’s jurisdiction over the present complaint against AFSCME, as a matter of law. Similarly, given that the documentation for the complaint relies upon forms 8872 and 990 submitted by AFSCME to the IRS under penalty of perjury, it is not “obviously unfounded or frivolous.”

2. The allegations against AFSCME involved “actual violations,” not “remedial” violations or “requests for technical correction.”

RCW 42.17A.005(2) defines an “actual violation” as one “that is not a remedial violation or technical correction.” Thus, violations are considered “actual violations” by default unless they meet the criteria to be considered lesser “remedial” or “technical” violations. Since AFSCME’s complete failure to disclose contributions received and certain expenditures made by its Special Account involves neither “remedial violations” nor “technical corrections,” it involves, by definition, “actual violations.”

a. AFSCME’s violations were not “remedial.”

As defined by RCW 42.17A.005(45), a “remedial violation” is one that meets *all* the following criteria:

- “(a) Involved expenditures totaling no more than the contribution limits set out under RCW 42.17A.405(2) per election, or one thousand dollars if there is no statutory limit;
- (b) Occurred:
 - (i) More than thirty days before an election, where the commission entered into an agreement to resolve the matter; or
 - (ii) At any time where the violation did not constitute a material violation because it was inadvertent and minor or otherwise has been cured and, after

consideration of all the circumstances, further proceedings would not serve the purposes of this chapter;

(c) Does not materially affect the public interest, beyond the harm to the policy of this chapter inherent in any violation; and

(d) Involved:

(i) A person who:

(A) Took corrective action within five business days after the commission first notified the person of noncompliance, or where the commission did not provide notice and filed a required report within twenty-one days after the report was due to be filed; and

(B) Substantially met the filing deadline for all other required reports within the immediately preceding twelve-month period; or

(ii) A candidate who:

(A) Lost the election in question; and

(B) Did not receive contributions over one hundred times the contribution limit in aggregate per election during the campaign in question.”

The largest contribution limit specified in RCW 42.17A.405(2) and updated by WAC 390-05-400 is \$2,000 for state and special purpose district elections. The total of \$81,293,134 in unreported contributions to the Special Account exceeds this threshold by more than 40,000 times and the \$250,000 in unreported expenditures exceeds the threshold by 125 times, so prong (a) above is not satisfied.

AFSCME’s failure to file a form C5 by October 10, 2016 disclosing a \$200,000 expenditure and \$21,685,781 in contributions occurred within 30 days of the general election. Though AFSCME’s other failures to disclose the Special Account’s expenditures and contributions generally occurred just *after* Washington elections, not more than 30 days before, the PDC had not “entered into an agreement to resolve the matter[s],” the violations were not “minor,” and the violations have not yet “been cured,” so prong (b) above is not satisfied.

Given that the primary purpose of the FCPA is to ensure “that political campaign... contributions and expenditures be fully disclosed to the public,”⁷ AFSCME’s failure to disclose \$250,000 in expenditures and its complete failure to disclose the source of the funds it expended to influence Washington elections, totaling \$81,293,134 in contributions, materially affected the public interest. Accordingly, prong (c) is not satisfied.

AFSCME has not yet been notified of its noncompliance by the PDC so (d)(i)(A) cannot yet be evaluated. AFSCME is not a candidate, so (d)(ii) is inapplicable.

In short, the magnitude of AFSCME’s numerous violations far surpasses the criteria to be considered “remedial.”

⁷ RCW 42.17A.001(1).

b. AFSCME’s violations did not involve “requests for technical corrections.”

RCW 42.17A.005(51) defines “technical correction” as:

“...a minor or ministerial error in a required report that does not materially impact the public interest and needs to be corrected for the report to be in full compliance with the requirements of this chapter.”

AFSCME’s violations do not meet this definition.

First, given that the primary goal of the FCPA is to ensure “that political campaign... contributions and expenditures be fully disclosed to the public,”⁸ AFSCME’s failure to disclose receipt of 401 contributions from eight out-of-state contributors totaling \$81,293,134 and used to make \$790,000 in expenditures (and failure to disclose \$250,000 of these expenditures) affecting Washington elections in multiple different years — including major election years — had a materially negative impact on the public interest.

Second, complete failure to report certain expenditures made and any contributions received is not a “minor or ministerial error,” as the reporting of contributions and expenditures is the heart and soul of the FCPA’s disclosure regime.

Third, some of AFSCME’s violations involved failure to file forms C5 and a failure to file cannot be considered a “minor or ministerial error *in a required report*” that was, by definition, actually filed.

AFSCME’s violations most certainly do not meet the definition of “technical correction.”

3. The PDC cannot resolve the present complaint against AFSCME with a written warning as involving “minor violations.”

WAC 390-37-060(1)(d) purports to authorize the PDC to “resolve any complaint that alleges minor violations of chapter 42.17A by issuing a formal written warning.”

WAC 390-37-061 provides:

- “(2) A minor violation is an actual violation that occurs:
- (a) When required information is not timely disclosed, but the public is not deprived of critical information; or
 - (b) When incomplete information is disclosed, but a good faith effort to comply with disclosure is made, and the public is not deprived of critical information.
 - (c) When any other violation of chapter 42.17A RCW has occurred that does not materially affect the public interest.”

⁸ *Ibid.*

a. WAC 390-37-060(1)(d) and WAC 390-37-061 conflict with and are preempted by RCW 42.17A.755 and RCW 42.17A.001(1).

While the PDC has been granted authority to engage in rulemaking, any rules it adopts must “carry out the policies and purposes” of the FCPA.

Regulations governing “minor violations” may have been valid at the time they were first adopted by the PDC in 2016, but passage of HB 2938 in 2018 rendered them a dead letter, as violative of the new statute.

Specifically, RCW 42.17A.755(1) now requires the PDC to take one of several actions after a complaint has been submitted. It “must” either: (1) dismiss the complaint; (2) resolve it as a remedial violation or request for technical correction; (3) initiate an investigation, conduct hearings and issue an enforce an appropriate order; or (4) refer the complaint to the Attorney General.

Neither RCW 42.17A.755 nor any other statute permits the PDC to designate some “actual violations” as merely “minor” and resolve them with a warning letter.

Accordingly, WAC 390-37-060(1)(d) and WAC 390-37-061 conflict with RCW 42.17A.755, do not “carry out the policies and purposes” of the FCPA established by RCW 42.17A.001(1), and are of no legal effect.

b. AFSCME’s violations were not “minor” for the purposes of WAC 390-37-061.

Even if the enforcement process for “minor violations” established by WAC 390-37-061 was valid and statutorily authorized, AFSCME’s violations still would not qualify as “minor” for purposes of the regulation.

While “critical information” for the purposes of WAC 390-37-061 is not defined, it would be unreasonable to conclude that AFSCME’s failure to disclose three expenditures totaling \$250,000 and 401 contributions totaling \$81,293,134 during multiple election years did not consist of “critical information” and did not “materially affect the public interest,” especially in light of the FCPA’s goal “that political campaign... contributions and expenditures be fully disclosed to the public.”⁹

4. The PDC should initiate enforcement action against AFSCME.

In light of the above, the PDC should initiate an investigation, conduct hearings and take enforcement action as required by RCW 42.17A.755(1)(b).

If the PDC does not have the capacity to begin the enforcement process under RCW 42.17A.755(1)(b) within 100 days, the Freedom Foundation would gladly relieve the PDC of the

⁹ RCW 42.17A.001(1).

burden of prosecuting AFSCME's violations committed in the past two years via a citizen action under RCW 42.17A.775.

Alternatively, the PDC would be justified, given the scope of AFSCME's violations, in referring the matter to the Attorney General for prosecution in accordance with RCW 42.17A.755(1)(c).

Conclusion

AFSCME's consistent and extensive failure to comply with Washington state campaign finance laws has substantively damaged election transparency by depriving the public of knowledge of \$250,000 in political expenditures by an out-of-state entity and by similarly obscuring the source of \$790,000 it spent to influence Washington elections by failing to disclose 401 contributions from eight out-of-state entities totaling \$81,293,134. AFSCME's likely failure to disclose an additional \$272,764 in independent expenditures did further harm to Washingtonians' ability to know who is influencing their elections.

AFSCME's pattern of disregard for Washington law stands in direct defiance of the FCPA's proclamation that "political campaign and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is to be avoided."¹⁰

We respectfully request that the PDC undertake a thorough investigation into these allegations and initiate an enforcement action or refer the matter to the Attorney General for prosecution.

Please do not hesitate to let me know if I can be of any further assistance in this matter. Thank you for your consideration.

Sincerely,



Maxford Nelsen
Director of Labor Policy
Freedom Foundation
P.O. Box 552, Olympia, WA 98507
(360) 956-3482
MNelsen@FreedomFoundation.com

¹⁰ *Ibid.*



Form C5 (2/16)	This space for office use P M A DATE FILED PDC R E C E I V E D SEP 07 2018
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County & Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input checked="" type="checkbox"/> This is the first report submitted during 2018 <input type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees

4. Officers or responsible leaders of committee:

Name and full address	Title
Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary-Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, GA, HI, IL, MN, NJ, NM, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
New Direction PAC 119 First Avenue S, Suite 320 Seattle, WA 98104	Contribution	8/28/2018	\$200,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$200,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$200,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official

 Title Secretary-Treasurer

Name - Typed or Printed
Elissa McBride
 Daytime Telephone No. (202) 429-1088
 E-Mail Address chui@afscme.org

Form C5 (1/14)	This space for office use P M A R K DATE FILED PDC JAN 11 2016 R E C E I V E D
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input checked="" type="checkbox"/> This is the first report submitted during 20 <u>16</u> <input type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:

Name and full address	Title
Laura Reyes 1625 L Street, NW Washington, DC 20036	Secretary-Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
1) Washington State Democrats P.O. Box 4027, Seattle, WA 98194	Contribution	12/4/2015	\$100,000
2) Washington State Democrats P.O. Box 4027, Seattle, WA 98194	Contribution	12/16/2015	\$100,000

9. Total contributions and expenditures (Add parts 6, 7, 8) \$200,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. \$300,000
 Include amounts shown on this report and C5 reports previously submitted this calendar year.

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,645.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official: *Laura Reyes* Name – Typed or Printed: Laura Reyes

Title: Secretary-Treasurer Daytime Telephone No. (202) 429-1088

E-Mail Address: CHul@afscme.org

Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution
 Name American Federation of State, County and Municipal Employees
 Street address 1625 L Street, NW
 City / State / Zip Washington, DC 20036

2. Check appropriate box
 This is the first report submitted during 2015
 This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.

3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:
 Name and full address

Title Secretary-Treasurer

Laura Reyes
 1625 L Street, NW
 Washington, DC 20036

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)
 AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV

Agency(s) website address

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
Washington State Democrats P.O. Box 4027 Seattle, WA 98194	Contribution	7/29/15	\$100,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8)

\$100,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State.

Include amounts shown on this report and C5 reports previously submitted this calendar year. \$100,000
 Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,645.00 in the aggregate to this out-of-state committee during the current calendar year.

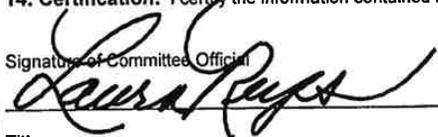
Name and full address	Employer name, city and state	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official

 Title
 Secretary-Treasurer

Name – Typed or Printed
 Laura Reyes
 Daytime Telephone No. (202) 429-1088
 E-Mail Address chui@afscme.org

Form <h1 style="margin: 0;">C5</h1> (1/14)	This space for office use P M O A S R DATE FILED PDC NOV - 6 2014 R E C E I V E D
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input type="checkbox"/> This is the first report submitted during 20__ <input checked="" type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:

Name and full address	Title Secretary-Treasurer
Laura Reyes 1625 L Street, NW Washington, DC 20036	

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
Real Representation in the 35th 3318 Fremont Ave, N, #545 Seattle, WA 98103	Contribution	10/10/2014	\$40,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$40,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$40,250

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total
	DATE FILED PDC		
	NOV - 6 2014		

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,645.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official

 Title
 Secretary-Treasurer

Name - Typed or Printed
 Laura Reyes
 Daytime Telephone No. (202) 429-1088
 E-Mail Address chui@afscme.org

Form C5 (2/16)	This space for office use P M A O S T K DATE FILED PDC R E C E I V E D AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input type="checkbox"/> This is the first report submitted during 20__ <input checked="" type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:	Title
Name and full address Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
AFSCME Washington Council 2 P.O. Box 750 Everett, WA 98206	Grant to an affiliate	8/26/2015	\$25,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$25,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State.

Include amounts shown on this report and C5 reports previously submitted this calendar year. \$125,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official


 Title
 Secretary Treasurer

Name – Typed or Printed
 Elissa McBride

 Daytime Telephone No. (202) 429-1088

 E-Mail Address chui@afscme.org

January - August 2015				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/9/2015	\$ 19,700.00	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/26/2015	\$ 55,152.86	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/9/2015	\$ 16,463.90	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/27/2015	\$ 17,304.95	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/20/2015	\$ 12,414.35	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/24/2015	\$ 12,867.20	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 71,217.94	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 169,603.25	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 7,402.35	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 8,385.40	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 31,410.68	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/12/2015	\$ 11,505.95	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2015	\$ 310,382.03	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 49,326.25	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 196,732.17	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 89,795.00	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 266,092.65	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 293,317.69	\$ 1,645,782.29
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 6,707.67	\$ 1,645,782.29

Total to Date \$ 1,645,782.29

Form C5 (2/16)	This space for office use P M A R K R E C E I V E D DATE FILLED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input type="checkbox"/> This is the first report submitted during 20__ <input checked="" type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:

Name and full address	Title
Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
AFSCME Washington Council 2 P.O. Box 750 Everett, WA 98206	Grant to an affiliate	10/16/2015	\$25,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$25,000

10. **Aggregate contributions and expenditures made during this calendar year in Washington State.** Include amounts shown on this report and C5 reports previously submitted this calendar year. \$150,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. **Contributions received from Washington residents.** List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. **Contributions received from persons residing outside of Washington.** List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. **Eligibility to Give to Political Committees and State Office Candidates:** A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. **Certification:** I certify the information contained in this report is true, complete and correct to the best of my knowledge

Signature of Committee Official


Name - Typed or Printed
 Elissa McBride

Title
 Secretary Treasurer

Daytime Telephone No. (202) 429-1088

E-Mail Address chui@afscme.org

January - October 2015				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/9/2015	\$ 19,700.00	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/26/2015	\$ 55,152.86	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/9/2015	\$ 16,463.90	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/27/2015	\$ 17,304.95	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/20/2015	\$ 12,414.35	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/24/2015	\$ 12,867.20	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 71,217.94	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 169,603.25	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 7,402.35	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 8,385.40	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 31,410.68	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/12/2015	\$ 11,505.95	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2015	\$ 310,382.03	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 49,326.25	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 196,732.17	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 89,795.00	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 266,092.65	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 293,317.69	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 6,707.67	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2015	\$ 50,524.65	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2015	\$ 403,720.98	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 168,694.45	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 290,888.37	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 166,038.46	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 49,270.50	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 43,415.15	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 9,459.15	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/22/2015	\$ 206,599.80	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2015	\$ 151,326.03	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2015	\$ 211,850.25	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2015	\$ 39,809.51	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/13/2015	\$ 5,136.00	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/14/2015	\$ 97,071.54	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/21/2015	\$ 78,626.75	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/22/2015	\$ 195,246.77	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/23/2015	\$ 49,504.45	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/23/2015	\$ 70,279.05	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/26/2015	\$ 93,574.69	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/26/2015	\$ 13,396.98	\$ 4,048,568.86
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/30/2015	\$ 8,353.04	\$ 4,048,568.86
			Total to Date	\$ 4,048,568.86

Form C5 (2/16)	This space for office use DATE FILED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input checked="" type="checkbox"/> This is the first report submitted during 2016 <input type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee: Name and full address Elissa McBride 1625 L Street, NW Washington, DC 20036	Title Secretary Treasurer
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5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
AFSCME Washington Council 28 1212 Jefferson Street, SE, Suite 300 Olympia, WA 98501	Grant to an affiliate	9/9/2016	\$200,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$200,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$200,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official


 Title
 Secretary Treasurer

Name – Typed or Printed
 Elissa McBride

 Daytime Telephone No. (202) 429-1088

 E-Mail Address chui@afscme.org

January - September 2016

Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/9/2016	\$ 331,992.30	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/10/2016	\$ 322,178.80	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/24/2016	\$ 833.00	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/26/2016	\$ 462,929.81	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/2/2016	\$ 5,329.00	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/2/2016	\$ 18,089.85	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/2/2016	\$ 90,201.60	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 329,252.66	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 159,382.88	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 10,645.45	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 1,174,222.35	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 557,145.15	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 95,885.93	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 92,027.40	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/3/2016	\$ 107,459.62	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/10/2016	\$ 2,502,957.96	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2016	\$ 215,908.05	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2016	\$ 15,041.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2016	\$ 3,805.50	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/24/2016	\$ 157,052.60	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 449,897.58	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 173,299.65	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 95,010.52	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 169,550.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 124,736.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 10,167.20	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 11,677.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2016	\$ 378,135.61	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/12/2016	\$ 2,377,956.15	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/13/2016	\$ 225,406.20	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/13/2016	\$ 365,495.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/13/2016	\$ 43,767.90	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/18/2016	\$ 46,910.70	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/18/2016	\$ 121,066.59	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/18/2016	\$ 237,000.81	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/18/2016	\$ 201,909.04	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/18/2016	\$ 290,538.90	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/20/2016	\$ 24,570.80	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/20/2016	\$ 1,287,920.30	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/15/2016	\$ 55,357.93	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/15/2016	\$ 14,397.80	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/16/2016	\$ 26,150.55	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/16/2016	\$ 740,652.01	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/17/2016	\$ 24,046.20	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2016	\$ 214,346.40	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/31/2016	\$ 85,433.10	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/31/2016	\$ 7,649.40	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/31/2016	\$ 141,887.60	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2016	\$ 66,853.65	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2016	\$ 90,349.65	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/6/2016	\$ 100,000.80	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 69,402.51	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 164,950.95	\$ 19,918,860.62

AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 18,599.85	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 407,456.03	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 113,027.10	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/7/2016	\$ 21,220.20	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/8/2016	\$ 33,080.40	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/8/2016	\$ 75,006.90	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/9/2016	\$ 10,836.00	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/9/2016	\$ (10,836.00)	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/13/2016	\$ 71,055.01	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/13/2016	\$ 12,325.74	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2016	\$ 363,031.80	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2016	\$ 450,725.89	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/19/2016	\$ 75,719.01	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/19/2016	\$ 55,693.78	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/23/2016	\$ 2,390,161.95	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/28/2016	\$ 216,784.50	\$ 19,918,860.62
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2016	\$ 526,133.55	\$ 19,918,860.62
Total to Date			\$ 19,918,860.62	

Form C5 (2/16)	This space for office use DATE FILED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution
 Name American Federation of State, County and Municipal Employees
 Street address 1625 L Street, NW
 City / State / Zip Washington, DC 20036

2. Check appropriate box
 This is the first report submitted during 20__
 This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.

3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:
Name and full address

Elissa McBride
 1625 L Street, NW
 Washington, DC 20036

Title
 Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
Real Representation in the 35th 3318 Fremont Ave, N, #545 Seattle, WA 98103	Contribution	10/10/2014	\$40,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) **\$40,000**

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year..... \$40,250

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official


 Title Secretary Treasurer

Name - Typed or Printed
 Elissa McBride

 Daytime Telephone No., (202) 429-1088

 E-Mail Address chui@afscme.org

January - October 2014				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/17/2014	\$ 9,084.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/16/2014	\$ 9,600.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/17/2014	\$ 6,145.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/29/2014	\$ 271,879.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/31/2014	\$ 10,000.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/12/2014	\$ 23,781.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/21/2014	\$ 3,500.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/21/2014	\$ 7,000.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/12/2014	\$ 1,050.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/21/2014	\$ 1,500.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/1/2014	\$ 121,606.37	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/29/2014	\$ 482,662.75	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/15/2014	\$ 383,111.43	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2014	\$ 720,691.08	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2014	\$ 36,904.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/28/2014	\$ 1,097,667.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/12/2014	\$ 78,501.45	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/12/2014	\$ 366,005.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/13/2014	\$ 360,525.73	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/16/2014	\$ 500,932.35	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/1/2014	\$ 88,512.38	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/1/2014	\$ 43,200.47	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/1/2014	\$ 26,511.05	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/9/2014	\$ 231,486.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/9/2014	\$ 23,411.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/10/2014	\$ 129,133.27	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2014	\$ 21,351.58	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2014	\$ 94,744.31	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2014	\$ 33,246.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2014	\$ 65,086.64	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2014	\$ 28,443.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/14/2014	\$ 312,497.50	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/14/2014	\$ 363,340.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/14/2014	\$ 413,059.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 81,202.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 126,347.72	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 207,031.53	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 46,535.25	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 14,475.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 23,958.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/21/2014	\$ 42,798.48	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/22/2014	\$ 348,767.70	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/29/2014	\$ 395,775.75	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/1/2014	\$ 85,884.92	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 397,247.90	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 297,167.07	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 21,142.70	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 24,367.20	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 366,334.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/4/2014	\$ 25,546.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/11/2014	\$ 409,990.02	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/11/2014	\$ 360,464.85	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/11/2014	\$ 149,637.45	\$ 29,368,240.06

AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/15/2014	\$ 85,092.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/21/2014	\$ 2,344,788.56	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/27/2014	\$ 250,217.44	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/29/2014	\$ 68,569.49	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/29/2014	\$ 119,748.90	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2014	\$ 394,105.94	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2014	\$ 299,994.24	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/4/2014	\$ 112,426.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/4/2014	\$ 5,967.23	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/4/2014	\$ 14,624.75	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/4/2014	\$ 33,853.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/5/2014	\$ 78,483.55	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/8/2014	\$ 2,341,778.56	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 214,012.50	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 394,441.09	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 161,814.95	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 268,015.09	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 292,901.88	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 69,470.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 20,543.75	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/10/2014	\$ 74,991.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/11/2014	\$ 348,198.88	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/12/2014	\$ 492,835.93	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2014	\$ 41,950.35	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2014	\$ 29,384.55	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2014	\$ 12,918.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2014	\$ 139,953.00	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/15/2014	\$ 128,118.18	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/16/2014	\$ 469,338.55	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/16/2014	\$ 25,201.45	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/16/2014	\$ 18,836.85	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/17/2014	\$ 358,634.70	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/18/2014	\$ 109,914.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/18/2014	\$ 148,434.05	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/18/2014	\$ 137,724.98	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/19/2014	\$ 7,769.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/19/2014	\$ 106,745.52	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/19/2014	\$ 3,605.70	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/26/2014	\$ 23,922.50	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/26/2014	\$ 23,219.14	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/26/2014	\$ 47,015.40	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/26/2014	\$ 69,336.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/26/2014	\$ 801,529.31	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/23/2014	\$ 292,419.60	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/23/2014	\$ 10,787.20	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/23/2014	\$ 6,116.66	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/23/2014	\$ 16,453.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/25/2014	\$ 445,183.74	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/29/2014	\$ 79,678.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/29/2014	\$ 35,517.85	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/29/2014	\$ 4,429.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/29/2014	\$ 25,913.40	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2014	\$ 108,325.73	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2014	\$ 18,190.90	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2014	\$ 1,985.97	\$ 29,368,240.06

AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2014	\$ 66,730.83	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/30/2014	\$ 191,636.61	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/2/2014	\$ 106,310.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/3/2014	\$ 1,119,195.45	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/3/2014	\$ 5,961.04	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/3/2014	\$ 13,917.13	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/6/2014	\$ 413,461.84	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/6/2014	\$ 393,512.84	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 120,433.05	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 297,821.53	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 69,464.54	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 160,688.90	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 94,881.65	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 409,502.17	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 446,369.30	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2014	\$ 22,469.35	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/8/2014	\$ 191,358.52	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2014	\$ 7,451.50	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2014	\$ 11,716.25	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/10/2014	\$ 366,781.80	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/10/2014	\$ 553,811.11	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/16/2014	\$ 143,948.74	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/16/2014	\$ 554,018.50	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/20/2014	\$ 74,599.10	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/20/2014	\$ 17,243.25	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/20/2014	\$ 293,681.83	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/20/2014	\$ 264,205.55	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/20/2014	\$ 246,578.54	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/21/2014	\$ 358,323.45	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/21/2014	\$ 86,517.75	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/22/2014	\$ 206,321.55	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/24/2014	\$ 20,196.15	\$ 29,368,240.06
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/31/2014	\$ 12,852.18	\$ 29,368,240.06
Total to Date			\$ 29,368,240.06	

Form C5 (2/16)	This space for office use DATE FILED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input checked="" type="checkbox"/> This is the first report submitted during 2015 <input type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:	
Name and full address	Title
Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
Washington State Democrats P.O. Box 4027 Seattle, WA 98194	Contribution	7/29/2015	\$100,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$100,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$100,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official


Name – Typed or Printed
 Elissa McBride

Title
 Secretary Treasurer

Daytime Telephone No. (202) 429-1088

E-Mail Address chui@afscme.org

January - July 2015				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/9/2015	\$ 19,700.00	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/26/2015	\$ 55,152.86	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/9/2015	\$ 16,463.90	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/27/2015	\$ 17,304.95	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/20/2015	\$ 12,414.35	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/24/2015	\$ 12,867.20	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 71,217.94	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 169,603.25	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 7,402.35	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 8,385.40	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 31,410.68	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/12/2015	\$ 11,505.95	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2015	\$ 310,382.03	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 49,326.25	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 196,732.17	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 89,795.00	\$ 1,345,756.93
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 266,092.65	\$ 1,345,756.93
Total to Date			\$ 1,345,756.93	

Form C5 (2/16)	This space for office use P M O A S R T K DATE FILED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input type="checkbox"/> This is the first report submitted during 20__ <input checked="" type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
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3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee:

Name and full address	Title
Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
Washington State Democrats P.O. Box 4027 Seattle, WA 98194	Contribution	12/4/2015	\$100,000
Washington State Democrats P.O. Box 4027 Seattle, WA 98194	Contribution	12/16/2015	\$100,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) **\$200,000**

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$350,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official

 Title Secretary Treasurer

Name - Typed or Printed
 Elissa McBride
 Daytime Telephone No. (202) 429-1088
 E-Mail Address chui@afscme.org

January - December 2015				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/9/2015	\$ 19,700.00	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	2/26/2015	\$ 55,152.86	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/9/2015	\$ 16,463.90	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/27/2015	\$ 17,304.95	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/20/2015	\$ 12,414.35	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/24/2015	\$ 12,867.20	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 71,217.94	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2015	\$ 169,603.25	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 7,402.35	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 8,385.40	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/11/2015	\$ 31,410.68	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/12/2015	\$ 11,505.95	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2015	\$ 310,382.03	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 49,326.25	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 196,732.17	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 89,795.00	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/28/2015	\$ 266,092.65	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 293,317.69	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/18/2015	\$ 6,707.67	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2015	\$ 50,524.65	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/2/2015	\$ 403,720.98	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 168,694.45	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 290,888.37	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 166,038.46	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 49,270.50	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 43,415.15	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/21/2015	\$ 9,459.15	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	9/22/2015	\$ 206,599.80	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/7/2015	\$ 151,326.03	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2015	\$ 211,850.25	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/9/2015	\$ 39,809.51	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/13/2015	\$ 5,136.00	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/14/2015	\$ 97,071.54	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/21/2015	\$ 78,626.75	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/22/2015	\$ 195,246.77	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/23/2015	\$ 49,504.45	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/23/2015	\$ 70,279.05	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/26/2015	\$ 93,574.69	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/26/2015	\$ 13,396.98	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	10/30/2015	\$ 8,353.04	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	11/3/2015	\$ 654.65	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	11/6/2015	\$ 35,782.23	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/3/2015	\$ 179,964.58	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/4/2015	\$ 224,239.50	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/17/2015	\$ 57,351.60	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/18/2015	\$ 70,815.98	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/21/2015	\$ 504,923.61	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/21/2015	\$ 218,763.32	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/22/2015	\$ 8,578.11	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/22/2015	\$ 1,284,675.08	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/22/2015	\$ 53,127.88	\$ 7,485,732.94
AFSCME International	1625 L Street, N.W., Washington, DC 20036	12/28/2015	\$ 798,287.54	\$ 7,485,732.94

Total to Date \$ 7,485,732.94

Form C5 (2/16)	This space for office use DATE FILED PDC AUG 14 2019
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Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution Name American Federation of State, County and Municipal Employees Street address 1625 L Street, NW City / State / Zip Washington, DC 20036	2. Check appropriate box <input checked="" type="checkbox"/> This is the first report submitted during 2018 <input type="checkbox"/> This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.
--	---

3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)
 AFSCME's separate segregated fund to support state and local candidates and committees.

4. Officers or responsible leaders of committee: Name and full address	Title
Elissa McBride 1625 L Street, NW Washington, DC 20036	Secretary Treasurer

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)	Agency(s) website address
AL, CA, CO, DC, HI, MN, MS, NJ, TN, WV	

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
New Direction PAC 119 First Avenue S., Suite 320 Seattle, WA 98104	Contribution	8/28/2018	\$200,000

Check here if continued on an attached sheet

9. Total contributions and expenditures (Add parts 6, 7, 8) \$200,000

10. Aggregate contributions and expenditures made during this calendar year in Washington State. Include amounts shown on this report and C5 reports previously submitted this calendar year. \$200,000

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y N

11. Contributions received from Washington residents. List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total

Check here if continued on an attached sheet

12. Contributions received from persons residing outside of Washington. List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
See attached list				

Check here if continued on an attached sheet

13. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

14. Certification: I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official


Name - Typed or Printed
 Elissa McBride

Title
 Secretary Treasurer

Daytime Telephone No. (202) 429-1088

E-Mail Address chui@afscme.org

January - August 2018				
Name	Address	Date	Amount	Aggregate Total
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/2/2018	\$ 280,853.26	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/2/2018	\$ 356,308.25	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	1/24/2018	\$ 501,021.83	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/15/2018	\$ 195,445.61	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/19/2018	\$ 54,717.85	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/29/2018	\$ 49,045.05	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	3/29/2018	\$ 27,206.75	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/2/2018	\$ 427,128.15	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/2/2018	\$ 93,808.29	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/2/2018	\$ 405,203.70	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/9/2018	\$ 31,664.69	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/9/2018	\$ 175,742.69	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/9/2018	\$ 503.10	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/9/2018	\$ 4,199.10	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/10/2018	\$ 138,152.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/16/2018	\$ 244,402.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/23/2018	\$ 23,572.70	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/23/2018	\$ 16,866.85	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/23/2018	\$ 30,726.20	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/23/2018	\$ 53,122.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	4/23/2018	\$ 275,845.10	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/4/2018	\$ 323,900.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2018	\$ 67,906.29	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/8/2018	\$ 187,293.72	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/14/2018	\$ 129,470.53	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/14/2018	\$ 129,142.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/14/2018	\$ 434,405.34	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/18/2018	\$ 617,523.95	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2018	\$ 52,800.40	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2018	\$ 364,279.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2018	\$ 160,111.44	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/23/2018	\$ 23,765.18	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/24/2018	\$ 19,704.10	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/24/2018	\$ 373,590.54	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/24/2018	\$ 143,080.96	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/24/2018	\$ 24,860.85	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 132,254.40	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 293,253.07	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 13,875.55	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 15,509.55	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 9,929.40	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 27,282.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 16,024.65	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/30/2018	\$ 96,330.01	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/31/2018	\$ 204,059.75	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	5/31/2018	\$ 214,956.28	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/1/2018	\$ 432,170.11	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2018	\$ 850,000.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2018	\$ 467,496.91	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2018	\$ 14,018.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/5/2018	\$ 19,165.02	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/12/2018	\$ 293,156.87	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/12/2018	\$ 57,061.70	\$ 14,232,354.14

AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/12/2018	\$ 48,878.75	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/13/2018	\$ 36,656.38	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/15/2018	\$ 10,894.20	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/18/2018	\$ 32,703.55	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/18/2018	\$ (36.18)	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/18/2018	\$ 3,618.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/22/2018	\$ 92,361.95	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 9,326.38	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 30,939.40	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 9,715.45	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 216,448.87	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 96,776.76	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 52,820.70	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	6/26/2018	\$ 293,174.95	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2018	\$ 80,969.40	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2018	\$ 106,556.50	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/11/2018	\$ 69,620.68	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/13/2018	\$ 460,664.23	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/17/2018	\$ 11,081.30	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/17/2018	\$ 110,111.90	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/17/2018	\$ 18,127.65	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/27/2018	\$ 217,504.52	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/27/2018	\$ 108,151.03	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/27/2018	\$ 15,626.90	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	7/27/2018	\$ 11,202.65	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/15/2018	\$ 258,391.56	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/16/2018	\$ 3,750.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/17/2018	\$ 9,942.80	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/17/2018	\$ 23,397.45	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 211,562.35	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 3,394.08	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 20,086.65	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 106,026.55	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 9,736.03	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 92,832.04	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/20/2018	\$ 10,773.60	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/21/2018	\$ 217,213.27	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/21/2018	\$ 5,152.30	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/22/2018	\$ 81,618.90	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/22/2018	\$ 19,848.05	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/23/2018	\$ 60,929.80	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/24/2018	\$ 1,206.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/24/2018	\$ 146,298.29	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/24/2018	\$ 48,644.95	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/24/2018	\$ 53,220.79	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/24/2018	\$ 34,103.00	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/27/2018	\$ 52,545.98	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/27/2018	\$ 45,330.57	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/28/2018	\$ 11,811.10	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/28/2018	\$ 399,120.07	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/28/2018	\$ 11,311.65	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/28/2018	\$ 541,061.05	\$ 14,232,354.14
AFSCME International	1625 L Street, N.W., Washington, DC 20036	8/28/2018	\$ 15,234.85	\$ 14,232,354.14

Total to Date \$ 14,232,354.14



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DANIELLE FRANCO-MALONE
Partner
DIR (206) 257.6011
franco@workerlaw.com

***Via U.S. Mail and via email to:
kurt.young@pdc.wa.gov***

August 5, 2019

Kurt Young
Compliance Officer
Public Disclosure Commission
711 Capitol Way S. #206
P.O. Box 40908
Olympia, WA 98504-0908

Re: Complaint from the Freedom Foundation
PDC Case No. 54145
BIL Case File No. 3416-001

Dear Mr. Young,

On behalf of the American Federation of Federal, State, County, and Municipal Employees ("AFSCME") we are hereby responding to the allegations raised by Freedom Foundation (the "Foundation") in the above-referenced matter. AFSCME maintains a self-funded Separate Segregated Fund within the meaning of 26 U.S.C. § 527(f)(3), which is registered with the Internal Revenue Service ("IRS") as "AFSCME Special Account" ("Special Account"). The Special Account files reports with the Public Disclosure Commission as an out-of-state political committee, (as "American Federation of State, County and Municipal Employees"), as required by law. The Foundation alleges that AFSCME and/or its Special Account violated provisions of the Fair Campaign Practices Act ("FCPA") governing out-of-state political committees, including failure to report a handful of expenditures and contributions, as well as independent expenditures.

In short, the Foundation's allegations are either wrong on the law or do not amount to material violations of the FCPA on the facts. A review of the Special Account's contribution reports relevant to this case reveals that Special Account has substantially complied with all FCPA requirements for out-of-state political committees. The Foundation's charge that there was a "consistent and extensive failure to comply with Washington state campaign finance laws" is baseless. It is, however, in keeping with the Foundation's strategy of distorting campaign finance law in order to make outlandish claims against organizations that do not subscribe to its own ideological agenda.

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ANALYSIS

I. The Alleged Failures to Disclose Independent Expenditures on C-6 Reports Are Wholly Without Merit.

The Foundation alleges that AFSCME's Special Account failed to file C-6 reports reflecting independent expenditures. However, the Foundation acknowledges that payments to Washington vendors for mail pieces and digital ad campaigns must be reported only if any of the purchases went to support or oppose candidates in Washington State. Here they did not. Instead, AFSCME's Special Account hired Hopkins & Sachs, Inc. and Cerillion N4 Partners to produce communications related to elections in Michigan, Minnesota, Oregon, and Wisconsin. Because RCW 42.17A.250 only requires the reporting of expenditures supporting or opposing a Washington state candidate or political committee, the Foundation's allegations that the Special Account failed to file C-6 reports are baseless and should be dismissed.

II. The Foundation's Allegations Regarding Failure to Report Expenditures and Contributions Are in Some Cases Unfounded and in Others So Minor As to Not Warrant an Enforcement Action.

A. The Alleged Failure to Report AFSCME's Own Self-Funding Of Its Segregated Fund Misapprehends the Nature of the Segregated Fund and Is Without Merit.

The Foundation alleges that AFSCME and/or the Special Account violated the FCPA by failing to disclose contributions from out of state donors and the source of its political spending in Washington. This argument rests entirely on the Foundation's depiction of AFSCME as an independent "contributor" to the Special Account. But the picture that the Foundation paints is incomplete. As prominently described on the submitted C-5s themselves, AFSCME's Special Account is a § 527 separate segregated fund. Although it is a legally distinct entity for purposes of the Internal Revenue Code, it is entirely controlled by AFSCME, all decisions regarding its activities are made by AFSCME, and it is entirely funded by AFSCME. AFSCME's Special Account is, in other words, an AFSCME bank account used and funded by AFSCME for AFSCME's own political activities. And, because it is simply an alter ego of AFSCME, it is registered with the PDC as AFSCME – the American Federation of State, County and Municipal Employees. In light of this fact and the Segregated Fund's exclusive funding from AFSCME, Special Account left blank the field on the C-5s for reporting contributions from "persons or corporations residing outside of Washington." It would elevate form over substance to require an organization to report itself as the source of contributions of its own funds deposited into its own bank account for its own reported activities as if these were standard contributions from other persons typically reported on an out-of-state PAC's C-5 form.

Moreover, the vast majority of the monies AFSCME deposited into its Special Account were not intended for electoral spending in Washington State and in fact were not used for political spending in Washington State. To put it in perspective, the Foundation alleges that \$81,293,134 should have been reported in contributions to the Special Account from 2014-2018. During this same time period, just \$790,000 of the political committee's funds were spent in Washington – less than one percent. In

other words, more than 99% of the deposits AFSCME made into its Special Account during the pertinent time period from 2014-2018 had nothing to do with electoral spending in Washington State.

Assuming *arguendo* that AFSCME's Special Account should have reported the AFSCME deposits as "contributions" received from out-of-state residents, the consequent FCPA violation was not material. Through its Form 8872 filings, AFSCME's Special Account has been fully transparent and comprehensive in publicly disclosing the source of its funding. Therefore, the public has not been denied the ability to inform itself of this financing. The fact that the Foundation has accessed and made use of these records is itself proof of AFSCME's Special Account's substantive compliance with campaign finance laws.

Regardless, to err on the side of disclosure and promoting as much public transparency as much as possible, AFSCME's Special Account will amend its C-5 reports to report AFSCME's deposits into the Special Account during the applicable periods.

B. The Special Account Has Not Received Contributions from Any Other Entities and the Foundation's Allegation That It Has Failed to Report Contributions from Miscellaneous Entities Is Unfounded.

The Foundation also alleges that the Special Account failed to report three contributions in 2014 from out-of-state contributors. Specifically, the Foundation alleges that the Special Account failed to report the following contributions:

- \$5,000 from Friends of Noam Bramson
- \$46,000 from Californians for Voter Turnout
- \$50,000 from the Committee for Working Families
- \$21,000 from Michigan for All
- \$25,000 from the Democratic Party of Hawaii
- \$8,500 from Ed Hernandez for Senate 2018
- \$11,609 from AFSCME SEIU Florida

However, each of these alleged contributions was not in fact a contribution reportable to the PDC. Instead, each reflected the Special Account's effort to report an intended expenditure that had been previously reported but was never consummated. For instance, the \$46,000 alleged contribution from Californians for Voter Turnout on October 14, 2014 corresponds to an expenditure the Special Account made to the same group on September 5, 2014 that was returned as a voided check. *See* App. p. 274, 250. Similarly, the \$50,000 contribution allegedly received from the Committee for Working Families on October 8, 2014 corresponds to a \$50,000 expenditure the Special Account made to that same entity on September 5, 2014 but that was returned as a voided check. App. at 273, 258. Likewise, the contributions from Friends of Noam Bramson, the Democratic Party of Hawaii, and Ed Hernandez for Senate 2018 were actually voided checks from intended contributions to each of those entities. The contributions from Michigan for All and AFSCME SEIU Florida also were not contributions *to* the Special Account, but rather, partial refunds of contributions to those entities *from* the Special Account, resulting in the return of AFSCME funds to the Special Account. In each instance, what appears to be a contribution on the 8872 form actually reports a returned expenditure.

IRS Form 8872 does not provide instructions on how to modify a previously filed report where the contributing party later learns that its contribution was not deposited, and does not provide a separate schedule or other reporting mechanism for disclosing that a receipt is a refund rather than a contribution. Rather than amend its previously filed 8872 reports, AFSCME's Special Account reported the unused contributions as contributions to the Special Account on Schedule A of a subsequently filed 8872. However, this effort to accurately account for the unused contribution does not convert those transactions to "contributions" that must be reported pursuant to RCW 42.17A.250(g).

From the PDC's perspective, those voided and refunded contributions are a non-event, they simply reflect AFSCME funds that never left or were returned to its Special Account. They do not reflect money that has been contributed to the Special Account by a third party (as opposed to by AFSCME, the Special Account's sponsor); thus, the Special Account properly did not report them as contributions. Reporting these transactions as contributions, then, would inaccurately amount to double reporting of contributions that already been reported on C-5 reports as deposits of AFSCME own funds into its SSF.

For these reasons, the Foundation's suggestion that AFSCME has failed to disclose receipts from entities *other than* AFSCME's general fund is without merit and should be dismissed.

C. The Alleged Failure to Report Three Expenditures Is a Relatively Minor Error that Has Since Been Corrected.

The Foundation alleges that AFSCME's Special Account, in the course of its long history of filing reports as an out-of-state PAC, failed to report three expenditures:

- \$25,000 to AFSCME Washington Council 2 on August 25, 2015
- \$25,000 to AFSCME Washington Council 2 on November 24, 2015
- \$200,000 to AFSCME Washington Council 28 on September 9, 2016

All three of these expenditures were reported to the IRS in a timely fashion on an 8872 form.

Now that these issues have been brought to its attention, the Special Account will amend its C-5 reporting to account for these three expenditures. Moreover, while the failure to report *any* electoral spending is unfortunate, the three expenditures at issue were insubstantial relative to the Special Account's spending in Washington and overall. The three disputed expenditures make up less than one-third of a percent of the \$81,293,134 the Foundation alleges that the Special Account took in during the pertinent time period. And, the Special Account correctly reported \$540,000 of its electoral spending in Washington to the PDC during the same period, meaning that approximately 70% of the Special Account's Washington spending was correctly reported in this state, while 100% of it was correctly reported to the IRS.

III. To the Extent Any of the Foundation's Allegations Are Found to Have Merit, They Involve Errors That Are So Minor as to Not Warrant Enforcement Action.

The Foundation's complaint has brought to light a handful of reporting errors that are relatively minor in light of the Special Account's long history of reporting as an out-of-state PAC in Washington. The reporting errors were the result of the Special Account's failure to appreciate two things about what must be reported on the C-5 reports: first, that *any* contributions intended for electoral political spending must be reported as expenditures, including political grants made through affiliate organizations, and second, that even deposits of AFSCME's own funds into its own separate segregated fund account may require reporting as "contributions" to the PAC. The Special Account now fully understands its reporting obligations and will report each of these categories of information in the future.

It is also worth emphasizing that there has never been a PDC complaint filed against AFSCME's Special Account during the time in which it has been registered as an out-of-state political committee in Washington. There is good reason to believe that the Special Account is fully capable of complying with reporting obligations when it understands what they are. In fact, the Foundation's examination of the Special Account's reporting over the past five years did not result in so much as a single late-filed report.

Moreover, the alleged shortcomings in the Special Account's reporting were minor in relation to the political committee's overall activities, the Special Account will take prompt action to amend its reporting in light of the Foundation's complaint, and it has taken steps to ensure that any similar issues do not arise in the future.

Finally, while the reporting errors were unfortunate, they did not result in the public being meaningfully deprived of information because in every instance, the information that allegedly should have been reported on a C-5 was timely reported on an 8872 form and readily available to the public.

Accordingly, to the extent there is any merit in the Foundation's allegations, they concern only "minor violations" that are appropriately resolved with a written warning. WAC 390-37-061(2)(a).

CONCLUSION

As a result of the Foundation's complaint, the Special Account has amended four previously filed C-5 reports to include reporting of AFSCME's deposit of funds into its Special Account on line 12, and has also filed three new C-5 reports. The Foundation's remaining allegations regarding alleged failure to report independent expenditures are without merit. AFSCME requests that the Foundation's complaint be dismissed outright, or resolved with a written warning. If you have any questions, or if there is anything we can do to be of assistance to you, please do not hesitate to contact me at (206) 257-6011.

Kurt Young
August 5, 2019
Page 6 of 6

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Franco-Malone". The signature is fluid and cursive, with the first name "Danielle" being the most prominent part.

Danielle Franco-Malone
Counsel for AFSCME