

Complaint Description

Glen Morgan reported via the portal Wed, 17 July 2019 at 11:16AM

To whom it may concern,

It has come to my attention that the Thurston County Democratic Central Committee during the 2016 campaign session violated Washington State's campaign finance laws (**RCW 42.17A**). Please note, these are additional and separate from any other violations this serial violator of the state's campaign finance laws has committed in the past.

1) Accepting Illegal Over limit Anonymous Contributions (Violation of RCW 42.17A.220 (4))

This PAC violated Washington State's campaign finance laws by accepting more than \$300 in anonymous contributions from donors. Specifically, it appears that they accepted \$886.49 in anonymous contributions (apparently from one source), which is \$586.49 more than the allowable anonymous contribution limit defined in **RCW 42.17A.220 (4)**.

Upon reviewing the expenditures by this candidate's political committee, there is no evidence supporting any claim these funds were eschewed to the Treasury of the State of Washington as is required in law. Therefore this is a violation of the statute, and these funds should be immediately forfeited to the Washington State Treasury (There should be no confusion between the payments to the State of Washington for the fine imposed on this committee by the Washington State Attorney General and the statutory requirement this committee has to forfeit these illegally retained anonymous dark money contributions)

I have attached the relevant C3 reports which provide the detail on the anonymous contributions received by this committee during the 2016 campaign. **This committee must forfeit \$586.49 to the Washington State Treasury immediately.** In this way, these funds can be squandered along with the rest of the general fund tax dollars, but at least this forfeiture of anonymous dark money funds may discourage others from attempting to hide their anonymous, secretive, dark money in this political campaign.

This committee should be warned about not taking secretive, dark money anonymously to fund political campaigns. This is a serious violation of Washington's State campaign finance laws and counter to the spirit and intention of transparency in the political process.

It should be noted for the record that this committee has been found guilty of campaign finance violations in the past by the Washington State Attorney General (See **Thurston County Superior Court Case #17-2-00972-34** attached for reference). The violation described above was not included in this past complaint and litigation of this Political Committee.

Please feel free to contact me if you have any further questions on this matter.

Best Regards,

Glen Morgan

100715540 - 0.80 - anonymous cash.pdf
42.88 KB

100709957 - 0.99 anonymous cash.pdf
53.74 KB

100709948 - 5 - anonymous cash.pdf
42.78 KB

100741548 - 5.03 - anonymous cash.pdf
42.7 KB

100696843 - 11 - anonymous cash.pdf
86.03 KB

100718179 - 16.49 - anonymous cash.pdf
42.91 KB

100703711 - 25 - anonymous cash.pdf
128.44 KB

100700300 - 25 - anonymous cash.pdf
61.71 KB

100687916 - 50 - anonymous cash.pdf
48.96 KB

100718166 - 747.18 - anonymous cash.pdf
42.95 KB

Pldg-20180615-StipJudg-Final-Thurston-Dems.pdf
279.49 KB

What impact does the alleged violation(s) have on the public?

The public has a right to have local political committees who do not fund their political campaigns by secretive, anonymous dark money funding as this campaign chose to do. This committee must forfeit these illegal dark money funds and send them to the Washington State Treasury where they can be squandered with the rest of the General Fund. At least it will send

a message to future dark money anonymous donors that their money is not welcome, even in political committees like this one.

See attached

The past treasurer and committee officers should be sufficient

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100715540

08-12-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
06/28/16	a. Anonymous	0.80	118.79
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			0.80	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

0.80

4. Date of Deposit

06/28/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

08-12-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100709957

07-22-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
04/30/16	a. Anonymous	0.99	55.99
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
04/30/16	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	0.56	
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			1.55	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

1.55

4. Date of Deposit

04/30/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

07-22-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

Statement of Miscellaneous Receipts Attachment to Form C3

Page 2

Candidate or Committee Name
Thurston County Democrats

Deposit Date

Date Received	Payee's Name, Address, City, State, Zip	Description	Amount
04/30/16	WSECU CHECKING 330 Union Ave SE Olympia, WA 98501	Bank Interest	0.56

Subtotal this page 0.56

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100709948

07-22-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
02/18/16	a. Anonymous	5.00	5.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N T	G E N E R A L	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			5.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

5.00

4. Date of Deposit

02/18/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

07-22-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100741548

01-11-2017

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
10/31/16	a. Anonymous	5.03	887.49
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N T	G E N E R A L	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			5.03	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

5.03

4. Date of Deposit

10/31/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

01-11-2017

Treasurer's Daytime Telephone No.: (360) 789-9731

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100696843

05-26-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
05/07/16	a. Anonymous	11.00	62.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
05/07/16	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	76.50	
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
05/07/16	JEFF SPRUNG 1911 Nob Hill Ave N Seattle, WA 98109	Self Seattle, WA OccupationATTORNEY			250.00	250.00
05/07/16	BEN RAY 8049 68TH LOOP SE OLYMPIA, WA 98513	Metmeds Pharmacy Lacey, WA OccupationBUSINESS OWNER			200.00	200.00
05/07/16	DYLAN CARLSON 1420 MADISON AVE NW OLYMPIA, WA 98502	Self Olympia, WA OccupationCONSULTANT			300.00	300.00
05/07/16	ALEX CHRISTIANSEN 4114 INDIAN SUMMER DR SE OLYMPIA, WA 98513	Occupation			30.00	30.00
05/07/16	JIM COOPER 719 CARLYON AVE SE OLYMPIA, WA 98501	Occupation			25.00	75.00
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			892.50	*See reverse for details.
		Amount from attached pages			1,000.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

1,892.50

4. Date of Deposit

05/07/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

05-26-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.) Thurston County Democrats	Deposit Date 05/07/16
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2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
05/07/16	ANDY RYDER 903 SELMA ST SE, #A LACEY, WA 98503-1123	City of Lacey Lacey, WA Occupation MAYOR OF LACEY			1,000.00	1,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total 1,000.00

Statement of Miscellaneous Receipts Attachment to Form C3

Page 3

Candidate or Committee Name
Thurston County Democrats

Deposit Date

Date Received	Payee's Name, Address, City, State, Zip	Description	Amount
05/07/16	SAM HUNT FOR STATE SENATE 8729 Fernwood St NE Olympia, WA 98516	Newspaper Advertising revenue	76.50

Subtotal this page 76.50

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100718179

09-02-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
07/10/16	a. Anonymous	16.49	882.46
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N T	G E N E R A L	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			16.49	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

16.49

4. Date of Deposit

07/10/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

09-02-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100703711

06-24-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
05/25/16	a. Anonymous	25.00	112.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
05/25/16	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>10</u> (persons)	250.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
05/25/16	TRACI MUSSETTER 2714 Otis Street SE Olympia, WA 98501				100.00	100.00
	Occupation					
05/25/16	ANDREW BURGESS PO BOX 5281 LACEY, WA 98509				65.00	65.00
	Occupation					
05/25/16	SHAWN D MYERS 2222 60TH LANE NW OLYMPIA, WA 98502	Thurston County Olympia, WA			260.00	730.00
	Occupation	COUNTY TREASURER				
05/25/16	MIZANUR RAHMAN 7522 38TH DR SE LACEY, WA 98503				65.00	90.00
	Occupation					
05/25/16	JIM MOELLER 4600 NW Harney Street Vancouver, WA 98663				65.00	65.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			830.00	*See reverse for details.
		Amount from attached pages			1,715.00	
					2,545.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit

05/25/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

06-24-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.) Thurston County Democrats	Deposit Date 05/25/16
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2. CONTRIBUTIONS OVER \$25.00						
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
05/25/16	DAVID MARKS 2323 9TH AVE SW APT 16-103 OLYMPIA, WA 98502	Occupation			50.00	50.00
05/25/16	JOSEPH DOWNING 2806 33RD TRL NE OLYMPIA, WA 98506	Wa Financial Institutions Olympia, WA Occupation FISCAL AGENT			130.00	180.00
05/25/16	PHYLLIS FARRELL 7910 WARBLER CT SE OLYMPIA, WA 98513	Occupation			65.00	90.00
05/25/16	KAREN BOWEN 1020 MCCORMICK STREET SE OLYMPIA, WA 98501	, Occupation RETIRED			130.00	180.00
05/25/16	ZACH SMITH 3505 26TH AVE NE OLYMPIA, WA 98506	AFSCEM Council 28 Olympia, WA Occupation PRINTER			130.00	130.00
05/25/16	PHYLLIS BOOTH 2509 CAITLIN CT SE OLYMPIA, WA 98501	, Occupation HOMEMAKER			195.00	300.00
05/25/16	HELEN WHEATLEY 3321 HUMPHREY ST SE OLYMPIA, WA 98501	, Occupation HOMEMAKER			130.00	180.00
05/25/16	FLORENCE VINCENT PO BOX 162 RAINIER, WA 98576	yelm food coop yelm, WA Occupation EMPLOYEE			65.00	130.00
05/25/16	KATIE NELSON PO BOX 6223 OLYMPIA, WA 98507	DSHS Olympia, WA Occupation STATE EMPLOYEE			130.00	135.00
05/25/16	FLORENCE VINCENT PO BOX 162 RAINIER, WA 98576	yelm food coop yelm, WA Occupation EMPLOYEE			65.00	130.00
05/25/16	SUSAN STACK 7835 Atchinson Dr SE Lacey, WA 98513	, Occupation RETIRED			195.00	220.00

Page Total 1,285.00

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 3

Candidate or Committee Name (Do not abbreviate. Use full name.) Thurston County Democrats	Deposit Date 05/25/16
--	--------------------------

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
05/25/16	JENNIFER FERGUSON PO Box 65764 University PLace, WA 98464	NA Gig Harbor, WA Occupation NONE			130.00	130.00
05/25/16	MIKE KREIDLER PO BOX 40256 OLYMPIA, WA 98504	state of washington Olympia, WA Occupation INSURANCE COMMISSIONER			130.00	130.00
05/25/16	CHRISTINE GARST 6015 MARANTHA LN SW OLYMPIA, WA 98512	Self-Employed Olympia, WA Occupation BOOKKEEPER			65.00	591.00
05/25/16	KAREN A JOHNSON 420 SHERMAN ST NW APRT 219 OLYMPIA, WA 98502	State of Washington Olympia, WA Occupation STATE EMPLOYEE			80.00	105.00
05/25/16	KAREN A JOHNSON 420 SHERMAN ST NW APRT 219 OLYMPIA, WA 98502	State of Washington Olympia, WA Occupation STATE EMPLOYEE			25.00	105.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total 430.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100700300

06-10-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
05/23/16	a. Anonymous	25.00	87.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
06/09/16	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	1,100.00	
05/23/16	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>1</u> (persons)	25.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
05/07/16	PROCEEDS FROM LOW COST ,				150.00	0.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			1,300.00	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

1,300.00

4. Date of Deposit

06/09/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

06-10-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

Statement of Miscellaneous Receipts
Attachment to Form C3

Candidate or Committee Name	Deposit Date
Thurston County Democrats	

Date Received	Payee's Name, Address, City, State, Zip	Description	Amount
06/09/16	JAY INSLEE FOR WASHINGTON 603 Stewart Street #819 Seattle, WA 98101	Office rent, sublease	300.00
06/09/16	WASHINGTON STATE DEMOCRATIC CENTRAL COMM. PO Box 4027 Seattle, WA 98194	Office rent - sublease	400.00
06/09/16	DENNY HECK FOR CONGRESS PO box 235 Olympia, WA 98507	RENT for office	400.00

Subtotal this page 1,100.00

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100687916

03-31-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
03/01/16	a. Anonymous	50.00	50.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
02/22/16	MAUREEN GALLEGOS 1919 EVERGREEN PARK DR SW APT OLYMPIA, WA 98502				25.00	25.00
	Occupation					
02/23/16	ALLEN ZIMMERMAN 13140 SHELLY ST SW OLYMPIA, WA 98512				50.00	50.00
	Occupation					
02/22/16	NANCY HELEY 3623 SURREY DR NE OLYMPIA, WA 98506				25.00	25.00
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			150.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

150.00

4. Date of Deposit

03/07/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

03-31-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

100718166

09-02-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)

Thurston County Democrats

Mailing Address

P O Box 164

City

Olympia, WA

Zip + 4

98507-0164

Office Sought (candidates)

Election Date

2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
04/30/16	a. Anonymous	747.18	803.17
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Sub-total			747.18	*See reverse for details.
	<input type="checkbox"/> Check here if additional pages are attached	Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

747.18

4. Date of Deposit

04/30/16

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Katrina Wynkoop Simmons

09-02-2016

Treasurer's Daytime Telephone No.: (360) 789-9731

1 ☐ EXPEDITE
2 ☐ No Hearing Set
3 ☒ Trial is Set
4 Date: Monday, July 9, 2018
5 Time: 8:30 a.m.
6 Judge Christopher Lanese

FILED

JUN 15 2018

Superior Court
Linda Myhre Ertter
Thurston County Clerk

7 **STATE OF WASHINGTON**
8 **THURSTON COUNTY SUPERIOR COURT**

9 STATE OF WASHINGTON,

10 Plaintiff,

11 v.

12 THURSTON COUNTY
13 DEMOCRATIC CENTRAL
COMMITTEE, a Washington nonprofit
corporation,

14 Defendant.

NO. 17-2-00972-34

STIPULATION AND AGREED
JUDGMENT

EX PARTE

15 **JUDGMENT SUMMARY (RCW 4.64.030)**

- 16 A. JUDGMENT CREDITOR: Plaintiff, STATE OF WASHINGTON
17 B. JUDGMENT DEBTOR: THURSTON COUNTY DEMOCRATIC CENTRAL
18 COMMITTEE, a Washington nonprofit corporation
19 C. PRINCIPAL JUDGMENT: \$16,686 with \$8,343 suspended for a period of four years
20 contingent on no findings of violations of the law
committed during the period of suspension as described
in the Stipulation and Judgment below
21 D. INTEREST: No prejudgment interest is owed. Principal judgment
22 amount(s) due and owing shall not bear interest unless
the principal judgment is unpaid by the due date specified
herein
23 E. COSTS AND FEES: \$8,000 as attorneys fees, \$240 as court costs, and \$2,500
24 as costs of investigation
25 F. ATTORNEYS FOR JUDGMENT CREDITOR: ROBERT W. FERGUSON
26 Attorney General
LINDA A. DALTON, WSBA No. 15467

STIPULATION AND
AGREED JUDGMENT

1 Senior Assistant Attorney General
2 S. TODD SIPE, WSBA No. 23203
Assistant Attorney General

3 G. ATTORNEY FOR TAKI FLEVARIS, WSBA No. 42555
4 JUDGMENT DEBTOR: PACIFICA LAW GROUP LLP

5 **STIPULATION**

6 The parties to this stipulation, Plaintiff, STATE OF WASHINGTON (STATE) and
7 Defendant, THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
8 Washington nonprofit corporation, desiring to resolve all claims arising out of the State's Third
9 Amended Complaint and made in citizen action notices received by the Attorney General's
10 Office since January 3, 2017 to the execution of the Stipulation, hereby enter into the following
11 stipulation:

- 12 1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
13 Washington nonprofit corporation, agrees to pay an assessed civil penalty in the amount of
14 \$16,686 for the violations of RCW 42.17A outlined in the State's Third Amended
15 Complaint.
- 16 2. The parties agree that \$8,343 of the assessed civil penalty will be suspended based on the
17 following terms and conditions:
 - 18 a. The suspension will be in effect for four years from the date of execution of the
19 Judgment. During the period of suspension, Defendant THURSTON COUNTY
20 DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation,
21 agrees that it will comply with RCW 42.17A.
 - 22 b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL
23 COMMITTEE, a Washington nonprofit corporation, is found by the Public Disclosure
24 Commission following an adjudicative proceeding or a court to have committed a
25 violation of RCW 42.17A during the suspension period, the suspended penalty of
26

1 \$8,343 will immediately become due and payable within 30 days of such finding
2 without further intervention of the Court.

3 c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
4 Washington nonprofit corporation, is not found to have committed violations of
5 RCW 42.17A by the Public Disclosure Commission following an adjudicative
6 proceeding or a court for conduct during the suspension period, then the suspended
7 portion of the penalty will be set aside without further intervention of the Court.


8 3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
9 Washington nonprofit corporation, agrees to pay the State the total amount of \$10,740 as
10 reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500)
11 in this action.

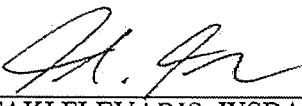
12 4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
13 Washington nonprofit corporation, agrees to pay the State the unsuspended portion of the
14 civil penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15,
15 and then installments of \$1500 on December 1 and June 1 each year starting on December
16 1, 2018 until paid in full. In the absence of extenuating circumstances, the failure to timely
17 make any installment will result in the remainder of the unpaid portion to be due within 30
18 days of the missed installment.

19 DATED this 14 day of June, 2018.

20 ROBERT W. FERGUSON
21 Attorney General

PACIFICA LAW GROUP LLP

22 
23 LINDA A. DALTON, WSBA No. 15467
24 Senior Assistant Attorney General
25 S. TODD SIPE, WSBA No. 23203
26 Assistant Attorney General
Attorneys for Plaintiff


TAKI FLEVARIS, WSBA No. 42555
Attorneys for Defendants

1 JUDGMENT

2 THIS MATTER came on regularly before the undersigned judge of the above-entitled
3 Court. Plaintiff, STATE OF WASHINGTON, appearing through its attorneys of record,
4 ROBERT W. FERGUSON, Attorney General, LINDA A. DALTON, Senior Assistant
5 Attorney General, and S. TODD SIPE, Assistant Attorney General, and Defendant
6 THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit
7 corporation, appearing through its attorney, TAKI FLEVARIS of the Pacifica Law Group LLP,
8 apprised the Court of their agreement to the entry of this judgment for the purpose of settling
9 and compromising this action brought under RCW 42.17A. The Court, having reviewed the
10 records and files herein, and having found the settlement to be a just and proper resolution of
11 this matter, and being otherwise fully advised, hereby ORDERS as follows:

- 12 1. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
13 Washington nonprofit corporation, is hereby assessed a civil penalty in the amount of
14 \$16,686 payable to the State of Washington for its violations of the provisions of
15 RCW 42.17A as outlined in the Stipulation.
- 16 2. The amount of \$8,343 of the assessed penalty is hereby suspended upon Defendant
17 THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a Washington
18 nonprofit corporation's compliance with the following court-ordered conditions:
- 19 a. The suspension will be in effect for four years from the date of execution of the
20 Judgment. During the period of suspension, Defendant THURSTON COUNTY
21 DEMOCRATIC CENTRAL COMMITTEE, a Washington nonprofit corporation shall
22 comply with RCW 42.17A.
- 23 b. In the event Defendant THURSTON COUNTY DEMOCRATIC CENTRAL
24 COMMITTEE, a Washington nonprofit corporation is found by the Public Disclosure
25 Commission following an adjudicative proceeding or a court to have committed a
26 violation of RCW 42.17A, the suspended penalty of \$8,343 shall immediately become

1 due and payable within 30 days of such finding without further intervention of the
2 Court.

3 c. If Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
4 Washington nonprofit corporation is not found to have committed violations of
5 RCW 42.17A by the Public Disclosure Commission following an adjudicative
6 proceeding or a court for conduct during the suspension period, then the suspended
7 portion of the penalty shall be set aside without further intervention of the Court.

8 3. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
9 Washington nonprofit corporation, shall pay the State the total amount of \$10,740 as
10 reasonable attorneys' fees (\$8,000), court costs (\$240), and costs of investigation (\$2,500)
11 in this action.

12 4. Defendant THURSTON COUNTY DEMOCRATIC CENTRAL COMMITTEE, a
13 Washington nonprofit corporation, shall pay the State the unsuspended portion of the civil
14 penalty (\$8,343) and fees and costs (\$10,740) as follows: \$5,000 payable by July 15, 2018,
15 and then installments of \$1,500 on December 1 and June 1 each year starting on December
16 1, 2018 until paid in full. In the absence of extenuating circumstances, the failure to timely
17 make any installment shall result in the remainder of the unpaid portion to be due within 30
18 days of the missed installment.

19 DONE IN OPEN COURT this 15 day of June, 2018.

20 **CHRISTOPHER LANESE**

21 JUDGE CHRISTOPHER LANESE

22 Presented by:

23 ROBERT W. FERGUSON

24 Attorney General

25 Linda A. Dalton
26 LINDA A. DALTON, WSBA No. 15467

Senior Assistant Attorney General

S. TODD SIPE, WSBA No. 23203

Assistant Attorney General

Attorneys for Plaintiff State of Washington

PACIFICA LAW GROUP LLP

Taki Flevaris

TAKI FLEVARIS, WSBA No. 42555

Attorneys for Defendant