Complaint Description

Glen Morgan (Sun, 21 Jul 2019 at 10:45 PM)

To Whom it May Concern --

It has come to my attention that Sophia Aragon running for Burien City Council, has habitually and willfully committed frequent and multiple violations of **RCW 42.17A.** Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

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

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (**WAC 390**).

Unfortunately, this campaign **has failed to file accurate C-4 reports** detailing campaign expenditures.

At a minimum, the candidate has failed to accurately report the following expenditures:

- 1. **Filing fee** a filing fee is required for this position, and Aragon wouldn't be able to run for office without paying this fee. Oddly, this candidate has reported on a C4 (**See PDC Report #100909258**) that she made two payments for filing fees for the "SeaTac City Council." This candidate is running for the Burien City Council, so both of these in-kind expenditures are false and inaccurate. Regardless, there is no reported filing fee for her campaign for the Burien City Council.
- 2. **Failed to provide adequate detail on purchases of campaign signs.** Aragon claims that she spent \$715 on 6/22/19 for "Yardsigns" through (**See PDC Report #100917602**). However, there is no information about how many yard signs were purchased, which is a requirement in order for this campaign to be in compliance with the statute.
- 2) Failure to properly identify sponsor of campaign website (Violation of RCW 42.17A.320)

I've attached a copy of the campaign website for Sophia Aragon for Burien City Council. No identification of who paid for this website is indicated on this website.

This candidate is aware of the filing deadlines and the PDC process for filing reports, as evidenced by some reports over the past few months being filed in this manner with the PDC already.

There are likely additional expenditures which have not been detailed here which will also need to be reported to the PDC.

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

Best Regards,

Glen Morgan

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

The public has no idea who sponsored and funded her website, and some critical elements of this candidate's campaign expenditures have been hidden from the public. This candidate is failing to follow basic campaign disclosure rules.

List of attached evidence or contact information where evidence may be found.

see attached

List of potential witnesses with contact information to reach them.

The candidate and the treasurer and any officers. The weird filing fee situation is worth understanding better.

Complaint Certification:

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.



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100909258

06-10-2019

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

(ELECT SOFIA FOR BURIE	N)						
Mailing Address 609 SW 150TH ST #48004				City BURIEN,	WA		
Zip + 4 98146	Office Sought (Candidates) CITY COUNCIL MEM		ion Date 9				nittees: During an independent
Report Period From (last C-4	To (end of per	iod) Final	Report?	expenditure	(i.e., an expense	not consider	red a contribution)
Covered 05/01/19	05/31/1	.9 Yes	No X	supporting or	opposing a state	e or local can	<u>didate</u> ?
RECEIPTS				*See next pa	ge	Yes	No
 Previous total cash and in kin (if beginning a new campaign 	nd contributions (From line 8, I or calendar year, see instruc	ast C-4) tion booklet)				\$	\$3,275.42
2. Cash received (From line 2, §				·			
3. In kind contributions received	(From line 1, Schedule B)				\$124.00		
4. Total cash and in kind contrib					-		\$3,334.00
5. Loan principal repayments ma							
6. Corrections (From line 1 or 3,	Schedule C)		. Show + o	(-)	\$0.00		
7. Net adjustments this period (Combine line 5 & 6)				Show + or (-)		\$0.00
8. Total cash and in kind contrib	outions during campaign (Com	bine lines 1, 4 & 7	7)	 1			\$6,609.42
9. Total pledge payments due (F	From line 2, Schedule B)		\$0.00				
EXPENDITURES							
Previous total cash and in kin (If beginning a new campaign	nd expenditures (From line 17, n or calendar year, see instruc	last C-4) tion booklet)					\$1,581.96
11. Total cash expenditures (From	m line 4, Schedule A)				\$37.20		
12. In kind expenditures (goods &	& services) (From line 1, Sche	dule B)			\$124.00		
13. Total cash and in kind expend	ditures made this period (Line	11 plus line 12)					\$161.20
14. Loan principal repayments ma	ade (From line 2, Schedule L)				\$0.00		
15. Corrections (From line 2 or 3,	Schedule C)		. Show + o	(-)	\$0.00		
16. Net adjustments this period (Combine lines 14 & 15)				Show + or (-)		\$0.00
17. Total cash and in kind expend			and 16)				\$1,743.16
CANDIDATES ONLY Won Lost U		SUMMARY sh on hand (Line 8	R minus line	ı 17)			\$4,866.26
		18 should equal your ba					_ + - / 0000 = 0
Primary election		bilities: (Sum of lo	oans and de	ebts owed)	······································		\$2,000.00
Treasurer's Daytime Telephone N (206)669-4924		ance (Surplus or	deficit) (Lin	e 18 minus line 1	9)		\$2,866.26
	iarmatian harsin and	oving achadul	Lattacher :	io true and	t to the best -f -	knowlade -	
CERTIFICATION: I certify that the inf Candidate's Signature	ormation nerein and on accompai Date		er's Signati		it to the best of my	knowieage.	Date
SOFIA ARAGON	06/10/1	9 JANET	MILLER	2 M		06	7/10/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

(11/93)

05/01/19

2

05/31/19

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

Report Date

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

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
05/04/2019	\$75.00	05/06/2019	\$100.00	05/24/2019	\$270.00	
05/06/2019	\$20.00	05/14/2019	\$75.00	05/29/2019	\$320.00	
05/01/2019	\$250.00	05/14/2019	\$2,000.00	See attached		

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ \$3,210.00

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

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

CODE DEFINITIONS ON NEXT PAGE

- C Contributions (monetary, in-kind & transfers)
- I Independent Expenditures
- L Literature, Brochures, Printing
- B Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising
- O Other Advertising (yard signs, buttons, etc.)
- V Voter Signature Gathering

- P Postage, Mailing Permits
- S Surveys and Polls
- F Fundraising Event Expenses
 T Travel, Accommodations, Meals
- M Management/Consulting Services
- W Wages, Salaries, Benefits
- G General Operation and Overhead

\$

\$37.20

Enter also on line 11 of C4

3. EXPENDITURES

4. TOTAL CASH EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	A	Amount
N/A	Expenses of \$50 or less	N/A	N/A		\$37.20
	_				
			Total from attached pag	es \$	\$0.00

Attachment to Schedule A Additional Deposits

for the period: 05/01/19 05/31/19

Name

(ELECT SOFIA FOR BURIEN)

(ELECT SOFIA FO	R BURIEN)				
Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
05/30/19	\$100.00	·			
	Į.			1	

3

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4 **B** (11/93)

4

Candidate or Committee Name (Do not abbreviate. Use full name.) (ELECT SOFIA FOR BURIEN)

Report Date 05/01/19 0

05/31/19

1.	IN KIND CONTRIBUTIONS RECEIVED	(goods, services, discounts, et	c.)
----	--------------------------------	---------------------------------	-----

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
5/06/19	SOFIA ARAGON PO Box 48004 Burien, WA 98148	SW King Co Chamber Luncheon	\$50.00	\$2,087.00	х		
5/15/19	SOFIA ARAGON PO Box 48004 Burien, WA 98148	Filing fee City Council of SeaTac	\$37.00	\$2,087.00	х		
5/15/19	SOFIA ARAGON PO Box 48004 Burien, WA 98148	Filing fee City Council of SeaTac	\$37.00	\$137.00		х	
-							
		TOTAL THIS PAGE	\$124.00				

LOANS

SCHEDULE TO C4

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(1:	2/5	90	۹۱

5

Candidate or Committee Name
(ELECT SOFIA FOR BURIEN)

Report Date 05/01/19 05/3

05/31/19

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount \$2,000.00	Principal Repaid or Forgiven	Amount Owed
5/14/19	SOFIA ARAGON PO Box 48004 Burien, WA 98148	\$2,000.00	\$0.00	
	Dallon, Mil 30110			\$2,000.00
			Subtotal This Page	\$2,000.00

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 100917602

07-16-2019

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

(ELECT SOFIA FOR BURIE	N)	,			
Mailing Address 609 SW 150TH ST #48004				City BURIEN, WA	
Zip + 4 98146 Report Period From (last C-4	Office Sought (Candid CITY COUNCIL	,	Election Date 2019 Final Report?	this report period, did the con	nucus Committees: During nmittee make an <u>independent</u> e not considered a contribution)
Covered 06/01/19	,	L5/19	Yes No X	supporting or opposing a state	
RECEIPTS	017.	13/13	165 110 22	*0	
				*See next page	Yes No
 Previous total cash and in kin (if beginning a new campaign 	d contributions (From li	ne 8, last C-4) nstruction boo	klet)		\$ \$6,609.42
2. Cash received (From line 2, S	Schedule A)			**************************************	-
3. In kind contributions received	(From line 1, Schedule	B)		\$11.00	-
4. Total cash and in kind contrib	utions received this per	iod (Line 2 plu	ıs 3)		\$11,244.00
5. Loan principal repayments ma	ade (From line 2, Sched	lule L)		\$0.00	-
6. Corrections (From line 1 or 3,	Schedule C)		Show + or	(-) \$0.00	_
7. Net adjustments this period (0	Combine line 5 & 6)			Show + or (-)	\$0.00
8. Total cash and in kind contrib	utions during campaign	(Combine line	es 1, 4 & 7)		\$17,853.42
9. Total pledge payments due (F	From line 2, Schedule B)	\$0.00		
EXPENDITURES		47.1.40	4)		
Previous total cash and in kin (If beginning a new campaign	or calendar year, see i	ne 17, last C-2 nstruction boo	+) klet)		\$1,743.16
11. Total cash expenditures (From	m line 4, Schedule A)			\$7,744.85	<u>i</u>
12. In kind expenditures (goods &	& services) (From line 1,	Schedule B)		\$11.00	1
13. Total cash and in kind expend	ditures made this period	(Line 11 plus	line 12)		\$7,755.85
14. Loan principal repayments ma	ade (From line 2, Sched	lule L)		\$0.00	<u>)</u>
15. Corrections (From line 2 or 3,	Schedule C)		Show + or	(-) \$0.00)
16. Net adjustments this period (Combine lines 14 & 15)			Show + or (-)	\$0.00
17. Total cash and in kind expend	ditures during campaign	(Combine line	es 10, 13 and 16)		\$9,499.01
CANDIDATES ONLY Won Lost U		CASH SUMMA		47)	\$8,354.41
	m m			17)ance(s) plus your petty cash balance.]	90,334.41
Primary election		9. Liabilities:	(Sum of loans and de	bts owed)	\$2,000.00
Treasurer's Daytime Telephone N		0. Balance (S	urplus or deficit) (Line	18 minus line 19)	
(206)669-4924		(0	, 22 2. 20.000 (2000		\$6,354.41
CERTIFICATION: I certify that the inf		companying sch			
Candidate's Signature	Date		Treasurer's Signatu	re	Date
SOFIA ARAGON	07/1	6/19	JANET MILLER	M	07/16/19

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

06/01/19

07/15/19

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

Report Date

(ELECT SOFIA FOR BURIEN)

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

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
06/05/2019	\$100.00	06/04/2019	\$1,425.00	06/23/2019	\$400.00	
06/06/2019	\$775.00	06/11/2019	\$100.00	06/25/2019	\$80.00	
06/10/2019	\$50.00	06/20/2019	\$50.00	See attached		

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

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

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

CODE **DEFINITIONS** ON NEXT PAGE

- C Contributions (monetary, in-kind & transfers)
- I Independent Expenditures
- L Literature, Brochures, Printing
- B Broadcast Advertising (Radio, TV)
- N Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.)
- V Voter Signature Gathering

- P Postage, Mailing Permits
- S Surveys and Polls
- F Fundraising Event Expenses T - Travel, Accommodations, Meals
- M Management/Consulting Services
- W Wages, Salaries, Benefits

Enter also on line 11 of C4 \$

\$7,744.85

G - General Operation and Overhead

3. EXPENDITURES

4. TOTAL CASH EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	\$8.23
06/30/19	ANEDOT 450 Laurel St, Suite 2105 Baton Rouge, LA 70811		credit card fees, June	\$90.90
06/28/19	JANET MILLER 7750 17th AVe NE Seattle, WA 98115		Treasury April & May	\$314.51
06/22/19	INDELIBLE MEDIA 19550 International Blvd. #103 SeaTac, WA 98188		Yardsigns, Capitol City Press, Tumwater, WA	\$715.00
07/01/19	LENNON CONSULTING, LLC 2500 SW Trenton St, #106 Seattle, WA 98106		Consulting July	\$1,000.00
07/02/19	DOLLAR TREE 363 Strander Blvd Tukwila, WA 98188		candy for 4th of July parade	\$76.00
07/10/19	INDELIBLE MEDIA 19550 International Blvd. #103 SeaTac, WA 98188		Printing for 7146 mail pieces, Capitol City Press, Tumwater	\$3,900.02
		1	Total from attached pages	\$ \$1,640.19

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

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

Report Date

(ELECT SOFIA FOR BURIEN)

06/01/19

07/15/19

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
07/10/19	CAPITOL CITY PRESS 2975 37th Ave SW Tumwater, WA 98512		Postage for mailers	\$1,360.07
07/15/19	ANEDOT 450 Laurel St, Suite 2105 Baton Rouge, LA 70811		Credit card fees July 1-15	\$280.12

Attachment to Schedule A Additional Deposits

for the period: 06/01/19

07/15/19

4

Name

(ELECT SOFIA FO	OR BURIEN)				
Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
06/27/19	\$50.00				
06/30/19	\$350.00				
07/01/19	\$175 . 00				
07/03/19	\$175 . 00				
07/05/19	\$50.00				
07/07/19	\$10.00				
07/06/19	\$750.00				
07/10/19	\$243.00				
07/12/19	\$5,775.00				
07/15/19	\$375.00				
07/15/19	\$300.00				
	-				
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IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4 **B** (11/93)

5

Candidate or Committee Name (Do not abbreviate. Use full name.) (ELECT SOFIA FOR BURIEN)

Report Date

06/01/19 07/15/19

1.	IN KIND CONTRIBUTIONS RECEIVED	(goods, services, discounts, et	c.)
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Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
06/08/19	SOFIA ARAGON PO Box 48004 Burien, WA 98148	Thank you cards	\$11.00	\$2,098.00	x		
	1	TOTAL THIS PAGE	\$11.00		1		

LOANS

SCHEDULE TO C4

ı		
ı		
(1	2/99)	

6

Candidate or Committee Name
(ELECT SOFIA FOR BURIEN)

Report Date 06/01/19 07/2

07/15/19

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

			Principal Repaid or Forgiven	
Date	Lender's Name and Address	Original Amount \$2,000.00	or Forgiven	Amount Owed
	SOFIA ARAGON	\$2,000.00		
5/14/19	PO Box 48004		\$0.00	
	Burien, WA 98148			\$2,000.00
	<u> </u>			
			Subtotal This	\$2,000.00
			Page	72,000.00

(https://secure.anedot.com/sofiaforburien/donate) (http://sofiaforburien.org/volunteer/)



CONTRIBUTE



VOLUNTEER

(http://sofia for burien.org/sign-up-for-email-



(http://sofiaforburien.org/latest-news/)



LATEST NEWS

Community Leader Sofia Aragon Announces Campaign For Burien City Council



Burien – Community Leader Sofia Aragon announced her campaign today for the Burien City Council. Aragon is running for Position 6, the position held by Austin Bell who is retiring.

"With thoughtful planning, communities are places where residents feel safe, where families want to raise their children and seniors can age in place. I want to make

sure Burien is a safe, health, and inclusive place where my family and residents both new and old can call home for a lifetime," said Sofia Aragon.

Sofia began her career as a registered nurse in south Seattle serving children, diverse families, and vulnerable populations. With a passion to improve health care for everyone, she pursued a law degree to be an advocate in Olympia. In Olympia, Sofia worked for a decade to improve public health, public safety, and education. She currently serves on the board of directors of the WA Low Income Housing Alliance to support solutions to homeless and access to affordable housing. As the Executive Director for a nonprofit organization, she is active in shaping a health workforce our communities need and meaningful employment for everyone.

As a member of the Burien Urban Center Advisory Committee, Sofia works to ensure that planning for the growth of Burien over the next 20 years includes making sure that health, education, and workforce needs of our community are addressed. Sofia lives with her husband, Brian, in Burien.

###

GET INVOLVED!

Email *

ZIP*

Update Me

f

(https://www.facebook.com/votearagon/)

Office	Current office holder	Filing fee	Where to file your declaration of candidacy	Where to submit your voters' pamphlet info +
City of Burien Council Position No. 2 nonpartisan office	Bob Edgar	\$72.00	King County Elections	King County Elections statement 150 education - 15 occupation - 10
City of Burien Council Position No. 4 nonpartisan office	Lucy Krakowiak	\$72.00	King County Elections	King County Elections statement 150 education - 15 occupation - 10
City of Burien Council Position No. 6 nonpartisan office	Austin Bell	\$72.00	King County Elections	King County Elections statement 150 education - 15 occupation - 10
City of Carnation Council Position No. 1 short and full term nonpartisan office	Ernest Fix	\$24.00	King County Elections	King County Elections statement 150 education - 15 occupation - 10
City of Carnation Council Position No. 3 short and full term nonpartisan office	Jim Berger	\$24.00	King County Elections	King County Elections statement 150 education - 15 occupation - 10