

Glen Morgan

reported via the portal (Thu, 25 Jul 2019 at 9:43 AM)

To whom it may concern,

It has come to my attention that People for Moon PAC has committed serious violations of Washington State's campaign finance laws (**RCW 42.17A**). These violations were committed during the 2017 election cycle.

1) Failure to accurately describe expense. (Violation of RCW 42.17A.240(6) & WAC 390-16-037, RCW 42.17A.235)

This PAC has failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures. Other than some minor expenditures and donor refunds, this campaign had one primary expenditure to report accurately, which they failed to do.

This is a classic example of a failure to provide sufficient detail of expenditures (unambiguous violations of **RCW 42.17A.240(6)** and **WAC 390-16-037** (see example B provided at **WAC 390-16-037(3)**):

The primary PAC expenditures reported on **PDC Report # 100797247 (see attached)** failed to report any detail associated with the \$25,000 expenditure to WinPower Strategies. "Digital Advertising" is insufficient detail and a clear violation of **WAC 390-16-037(3)**. This PAC must fix this C4 report so that the public may know how these funds were actually spent.

The PDC should conduct a thorough review of this PAC's campaign to identify other violations which may have been committed.

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

Best Regards,

Glen Morgan

Complaint Description
What impact does the alleged violation(s) have on the public?
The public has a right to know how significant campaign expenditures, in this case \$25,000 were actually spent. Consulting groups like WinPower Strategies must provide sufficient detail and evidence of their expenditures and report these correctly to the PDC so that the people may know the truth.
List of Attached evidence or contact information where evidence may be found
see attached
List of potential witnesses with contact information to reach them
Andy Lo, Treasurer, any officers of this PAC, and the principals of WinPower Strategies
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
	100797247
	10-31-2017

Candidate or Committee Name (Do not abbreviate. Include full name) People for Moon			
Mailing Address P.O. BOX 15855		City SEATTLE, WA	
Zip + 4 98115	Office Sought (Candidates)	Election Date 2017	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate?</u>
Report Period Covered 10/17/17	From (last C-4) To (end of period) 10/30/17	Final Report? Yes No X	

RECEIPTS

*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	0.00
2. Cash received (From line 2, Schedule A)	\$	27,500.00
3. In kind contributions received (From line 1, Schedule B)		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		27,500.00
5. Loan principal repayments made (From line 2, Schedule L)		0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		27,500.00
9. Total pledge payments due (From line 2, Schedule B)		1,200.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		0.00
11. Total cash expenditures (From line 4, Schedule A)		25,000.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		25,000.00
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		25,000.00

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

Treasurer's Daytime Telephone No.:

(206) 335-8815

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)	2,500.00
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed)	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	2,500.00

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

Candidate's Signature	Date	Treasurer's Signature	Date
		ANDY LO	

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

A
(11/93)

2

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

Report Date

10/17/17 10/30/17

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

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/17/2017	17,000.00					
10/20/2017	8,000.00					
10/24/2017	2,500.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 27,500.00

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:

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

CODE
DEFINITIONS
ON NEXT PAGE

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

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

3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10/27/17	WINPOWER STRATEGIES 19550 INTERNATIONAL BLVD #103 SEATAC, WA 98188		WINPOWER STRATEGIES,DS Political - Digital advertising	25,000.00

Total from attached pages \$ 0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 25,000.00

Date Notified of Pledge	Name and Address of Pledge Maker	Fair Market Value	Aggregate Total	P R I 	G E N 	If total over \$100, Employer Name, City, State, Occup.
10/30/17	KC GOLDEN 3100 LAKEWOOD AVE S SEATTLE, WA 98144	200.00	200.00			CLIMATE SOLUTIONS SEATTLE WA POLICY ADVISOR
10/30/17	CHRISTINA WOHLSTETTER 1041 SUMMIT AVE E SEATTLE, WA 98102	500.00	500.00			RETIRED SEATTLE WA RETIRED
10/30/17	PHILIP WOHLSTETTER 1041 SUMMIT AVE E SEATTLE, WA 98102	500.00	500.00			RETIRED SEATTLE WA RETIRED
		TOTAL THIS PAGE	1,200.00			