

## Complaint Description

Alexwramel (Tue, 22 Oct 2019 at 7:37 PM)

The PAC "Coalition for a Better Northwest Washington" (the PAC) appears to have violated several reporting requirements including the requirement to report a donation of unknown amount from Marathon Petroleum, a failure to report a donation of \$70,000 from Phillips 66 for more than one week during the election period, and a failure to comply with the 21 day rule.

The PAC has sent mailers (photo attached) and is advertising online (screenshot of the disclaimer attached). The website they are directing traffic to is [www.SatpalSaidWhat.com](http://www.SatpalSaidWhat.com). I was sent these photographs and a link to the website which was live on Friday, October 18th. It is still active as of this writing on Oct 22.

In each case the required disclaimer indicates that the top donors include Phillips 66 and Marathon Petroleum. Each of these two donations appears to be a different violation.

1. As of Tuesday Oct 22, the Marathon donation has not been reported. According to the C6 filing (<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=C6-9530>) the expenditure was made on Oct 14. The donation listed should have been reported by now and the fact that it has not been is a violation of the special reporting of large contributions requirement.

2. The Phillips 66 donation was reported on the C3 submitted on 10/21 (<http://web.pdc.wa.gov/rptimg/default.aspx?repno=100939879>) as having been received on 10/10/19. If the PAC had followed the law, it should have been reported in the C3 filed on Oct 14. If for whatever reason the check hadn't been processed yet, then it should have been reported as a pledge. I note that RCW 42.17A.005(15)(i) includes "pledges" as the same as a contribution. Clearly the PAC was already making commitments to spend the money.

3. If either donation was not *processed* by the PAC until after October 14, as their C3 filings suggest, then the donations also appear to be a violation of the 21-day rule.

I would submit several additional factors for your consideration:

1. These actions are a part of a pattern of abuse of the system in Whatcom County Elections. In 2013, in a similar Whatcom County Election, the PAC Whatcom First committed a substantially

similar violation, accepting tens of thousands of dollars after the deadline and failing to report on time. Whatcom First was fined by the PDC for the violation. <https://pdc-case-tracking.s3-us-gov-west-1.amazonaws.com/2708/14005.order.pdf>. In that hearing they were represented by Dan Brady.

2. Dan Brady Law is listed as an in-kind contributor to Coalition for a Better NW Washington for \$3420.

3. In a similar case in 2015, a different PAC (Clear Ballot Choices) was attempting to influence Whatcom County elections, was again found to have improperly reported campaign expenditures. In that case, the actor who was identified as at fault was Tony Larson. Tony Larson is now a candidate for County Executive. It appears that the illegally received \$70,000 will be spent as an independent expenditure predominantly attacking his opponent.

I therefore ask the PDC to take all possible and urgent action to prevent the illegal use of these funds in this election and to hold those responsible to full account. I ask that this violation be treated as a willful, repeat offense.

Alex Ramel

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

Voters of Whatcom County have been denied information about significant efforts to influence the election while voters are considering their ballots. A \$70,000 donation to influence the election is nearly equal to the general election spending of one candidate in the race. Voters have a right to know that the oil industry is attempting to influence the election.

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

The PAC has sent mailers (photo of the front and back attached) and is advertising online (screenshot of the disclaimer attached). The website they are directing traffic to is [www.SatpalSaidWhat.com](http://www.SatpalSaidWhat.com).

**List of potential witnesses with contact information to reach them.**

No additional witnesses.

**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.