

## Complaint Description

[Glen Morgan](#) (Wed, 23 Oct 2019 at 12:09 AM)

To whom it may concern,

It has come to my attention that Woodinville Citizens First PAC committed numerous violations of Washington State's campaign finance laws (**RCW 42.17A**).

### **1) Failure to file statement of organization within 3 days of making campaign expenditures when created within three weeks of an election. (Violation of RCW 42.17A.205)**

The Woodinville Citizens First PAC was formed sometime before October 17, 2019, and it produced a mailer (see attached) which was sent to voters in the City of Woodinville. See the attached C6 and LMC report filed by this campaign detailing expenditures and contributions of \$2,341. Unfortunately, this PAC failed to register with the PDC as required in **RCW 42.17A.205**. This is a clear violation of the law.

### **2) Failure to identify a campaign treasurer (Violation of RCW 42.17A.210)**

Due to a failure to file a statement of organization with the PDC, no treasurer has been identified for this PAC. A clear violation of **RCW 42.17A.210**.

### **3) Failure to identify a campaign depository (Violation of RCW 42.17A.215)**

Since no Statement of organization was filed with the PDC, no campaign depository has been identified for this PAC. This is a textbook violation of **RCW 42.17A.215**.

Additionally, since no contact information for this PAC is provided to the public because of this PAC's failure to properly register with the PDC, there is no possibility of the public being afforded the possibility to inspect campaign books. This is also a violation of the statute.

### **4) Inaccurate identification of top 5 contributors to this PAC on the mailer (Violation of RCW 42.17A.320)**

The mailer in question and attached to this complaint as an example, claims that there were two top 5 contributors to this PAC, which is untrue, according to the LMC filed on October 19, 2019 (see attached) there was only one donor to this campaign – Susan Boundy Sanders. However, according to the mailer, two top 5 contributors were identified – the false one was named "Paula Waters," however she is nowhere to be found in the LMC as a contributor to this PAC or mailer. It appears this was a false claim and fraudulent information to distribute to the voters of Woodinville.

### **5) Failure to accurately name the PAC (attempt to conceal the primary sponsor) (Violation of RCW 42.17A.005 (46)(i), RCW 42.17A.205 and WAC 390-16-011A)**

This PAC has violated Washington State's campaign finance laws by failing to properly name the PAC itself. **RCW 42.17A.005 (46)(i)** clearly requires the name of this PAC to be Woodinville Citizens First PAC (Sponsored by Susan Boundy Sanders) because Susan Boundy Sanders represents 100% of the contributions received by this PAC, which is far more than the 80% threshold required to identify the sponsor of the PAC in the name of the PAC itself (**See WAC 390-16-011A**). The PAC is incorrectly identified and named on its LMC, C6 and the mailer itself (see attached).

This campaign needs to go back and correct the missing and insufficient information provided to the PDC during this well-funded mailing occurring right now in the middle of a political campaign. It should be noted that the prime sponsor, solo donor and named person who appears to be mostly organizing this Pac is a seasoned politician. They have the experience to know better than to break the law as egregiously as this.

Let me know if you need additional information.

Best Regards,

Glen Morgan

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

The public has a right to know who actually sponsors secretive PACs like this, the controlling sponsor, even if they are an elected official, should not be allowed to hide in secrecy. They also must disclose their PAC with the PDC for the public to see, and they can't attempt to deceive the public by falsely claiming people have donated to the PAC when they have not yet done so.

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

All attached

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

The prime sponsor, donor, and genius behind this PAC -

**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.

## Talent. Integrity. Vision. Commitment. Elect Paul Hagen and Nicolas Duchastel.

When employers make hiring decisions they select the best applicant. The same should hold true for elections: Woodinville's best interests are served when voters elect the best candidates to City Council. As two of Woodinville's longest-serving Councilmembers, we've talked with many applicants and candidates over the years, and we strongly recommend Paul Hagen and Nicolas Duchastel for Woodinville City Council.

**Talent.** Paul and Nicolas are highly respected professionals, on upward trajectories in their day jobs. They're smart, wise, practical, and down-to-earth.

**Integrity.** Paul and Nicolas will bring needed candor, transparency, and respect for the rules Council has set for itself.

**Vision.** In the next few years Woodinville has important decisions to make, from budgets to project priorities to deciding where to locate new housing. Paul and Nicolas will help craft a comprehensive, coherent long-term vision, developed carefully and with good judgment, for steady progress toward sound goals.

**Commitment.** Paul and Nicolas have shown their commitment to Woodinville by volunteering on city commissions and in schools, scouting, and more.

**It's all about keeping Woodinville a great place to live.** We trust Paul and Nicolas to apply those strengths—talent, integrity, vision, and commitment—to help make good decisions about the many high-stakes issues coming to the Woodinville City Council over the next four years. A few highlights:

- Where to put our next state-mandated round of housing growth.
- Whether to create and implement comprehensive long-term plans, or continue our current pattern of scatter-shot governance.
- Woodinville's involvement—or not—in protecting the environment.
- Woodinville's involvement—or not—in protecting the Sammamish Valley.
- The future of the Wellington Hills Golf Course and the Northshore School District's plans to build schools on the site regardless of the fault zone that crosses it.

*Susan Paula*

Susan Boundy-Sanders and Paula Waters, Woodinville City Councilmembers





**Talent. Integrity. Vision. Commitment.**  
**We endorse Paul Hagen and Nicolas**  
**Duchastel for Woodinville City Council.**

No candidate authorized this ad. It is paid for by  
Woodinville Citizens First  
PO Box 726  
Woodinville, WA 98072

Top Five Contributors,  
Susan Boundy-Sanders  
Paula Waters

PRSRT STD  
U.S. POSTAGE  
PAID  
SEATTLE, WA  
PERMIT NO. 5544



WOODINVILLE, WA 98072-7980



Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — **\$100 or more**  
 **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — **\$1,000 or more**  
 **ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — **\$1,000 or more**

<b>1. Name and complete postal mailing address of sponsor:</b>  WOODINVILLE CITIZENS FIRST PO BOX 726 WOODINVILLE, WA 98072	E-mail
	SBSAND@HOTMAIL.COM
	Telephone
	4255913672

**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/11/19	10/11/19	L2, INC 18912 NORTH CREEK PKWY #201 BOTHELL, WA 98011	MAILING LIST	137.50
10/17/19	10/17/19	TRADE PRINTERY 317 SOUTH BENNETT STREET SEATTLE, WA 98108	POSTCARDS	2,203.70
Expenditures \$100 or less not itemized above				\$ 0.00

	Total this report	\$ 2,341.20
<p><b>Amount or Value</b>          *If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.</p>	<p>Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.</p>	\$ 2,341.20

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
DUCHASTEL DE MONTROUGE, NICOLAS	CITY COUNCIL MEMBER/CITY OF WOODINVILLE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 1,170.60	\$ 1,170.60
HAGEN, PAUL	CITY COUNCIL MEMBER/CITY OF WOODINVILLE	NON PARTISAN	<input checked="" type="checkbox"/>	<input type="checkbox"/>	\$ 1,170.60	\$ 1,170.60
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

**Filer Name:**

**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a)  An individual using only personal funds.
- b)  An individual using personal funds and/or funds received from others.
- c)  A business, union, group, association, organization, or other person using only general treasury funds.
- d)  A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e)  A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f)  A political committee filing C-5 reports. (RCW 42.17A.250)
- g)  Other

**If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.**

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
<b>TOTAL FUNDS RECEIVED</b>			<b>\$ 0.00</b>

<b>Sponsor of Independent Expenditure or Electioneering Communication</b>		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature _____ Printed Name <b>SUSAN BOUNDY-SANDERS</b>	
	Street address <b>17859 149TH AVE NE</b>	
	City/State/Zip <b>WOODINVILLE WA 98072</b>	
	Date Signed <b>10/18/19</b>	Place Signed (city and county) <b>WOODINVILLE KING</b>
	*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	



**LAST MINUTE CONTRIBUTION  
OF \$1,000 OR MORE**

<http://www.pdc.wa.gov/lmcapp/lmc>

100939121

10/18/2019

Woodinville Citizens First

Name of Reporting Entity

PO Box 726

Address

Woodinville

WA

98072

City

State

ZIP+4

**Reporting Entity (check one):**

Received a contribution of

\$2,203.70

on

10/17/2019

(Amount)

(Date)

Made a contribution of

on

(Amount)

(Date)

InKind description (if any):

**Contribution was received from/made to the following:**

Susan Boundy-Sanders

Name

17859 149th Ave NE

Address

Woodinville

WA

98072

City

State

ZIP+4

If earmarked contribution, name conduit:

If the recipient of the contribution is a candidate, provide the following information:

Office

Jurisdiction/District

Position

Party

Name of person sending this notice:

Susan Boundy-Sanders

Daytime Telephone Number:

425-591-3672

Email Address:

sbsand@hotmail.com

S

[Susan Boundy-Sanders](#)

reported via email, 3 days ago (Fri, 18 Oct 2019 at 12:06 PM)

to:

"PDC Washington Public Disclosure Commission" <pdcc@pdcc.wa.gov>

Hello PDC,

Two questions. Please be sure to respond to both.

1. I filled in an expenditure report for Woodinville Citizens First but cannot find it online. From your end, does it look like the expenditures supporting two candidates, totaling \$2341.20, has been completely and successfully reported?
2. My personal funds to pay for this expenditure are intended as a loan rather than a contribution, in hopes of contributions from other individuals over the next few weeks. How do I report it as a loan rather than a contribution? I'm on this

page:

The screenshot shows a web browser window with the URL <https://web.pdc.wa.gov/lmcapp/lmc/create#>. The page title is "PDC Home Page" and it features a blue header with the text "LAST MINUTE CONTRIBUTION OF \$1,000 OR MORE" and links for "FAQ", "Online Help", and "Start LMC Report". The main content area is titled "Special Report" and contains a form for reporting an expenditure. The form is divided into three sections: "Reporting Entity", "Contribution was Received From the Following", and "Information of Person Sending This Notice".

**Reporting Entity**

Name: Woodinville Citizens First  
Address: PO Box 726  
City: Woodinville State: WA ZIP+4: 98072  
 Received  Made  
Amount: \$2203.70 Date: 10/17/2019  
If in-kind, please describe:

**Contribution was Received From the Following**

Name: Susan Boundy-Sanders  
Address: 17859 149th Ave NE  
City: Woodinville State: WA ZIP+4: 98072  
If earmarked contribution, give name of conduit:  
If the recipient of the contribution is a candidate, provide the following information:  
Office: --Select One-- Jurisdiction/District: --Select One--  
Position: Party: --Select One--

**Information of Person Sending This Notice**

Name: Phone: XXX-XXX-XXXX Email:

Buttons: Submit View PDF

Thanks,

Susan Boundy-Sanders  
sbsand@hotmail.com  
425.591.3672  
17859 149th Ave NE  
Woodinville, WA  
98072-6202  
Boundy-Sanders.com

Good afternoon Scott,

With regard to my loan-not-contribution, I have completed the filing report as a contribution, as you described. As you suggested, please do add my email confirming the intent is a loan to be repaid with future contributions from others, if any materialize.

Kind regards,

Susan Boundy-Sanders  
sbsand@hotmail.com  
425.591.3672  
17859 149th Ave NE  
Woodinville, WA  
98072-6202  
Boundy-Sanders.com