

Complaint Description

[Glen Morgan](#) (Mon, 28 Oct 2019 at 3:27 PM)

To whom it may concern,

It continues to be obvious that Citizens for Liberty and Labor PAC has committed egregious, repetitive and serious violations of Washington State's campaign finance laws (**RCW 42.17A**).

1) Failure to properly identify top contributors in political television, IEs, etc (and Youtube) advertising (Violation of RCW 42.17A.320)

This PAC has not once legally complied with Washington State's campaign finance laws where they need to provide proper identification of top contributors in their media communication. The PDC has made these requirements (some of which were changed by Spokane legislator Andy Billig's bill passed last year and which most of the politicians this PAC supports with IE expenditures who have gone on the record supporting), and which the PDC helpfully explained here:

<https://www.pdc.wa.gov/learn/publications/independent-expenditure-ads-electioneering-communications>

Note, in particular, the requirements of Independent Expenditures to properly account for their top 5 contributors including drilling down into the individual sources of donations from any PACs who kicked in the cash for the IEs.

This secretive dark money funneling PAC conceals the majority of their contributors because they conceal all the top donors to this PAC from the major PACs who sent them money.

Keep in mind, this PACs very response to the original complaint filed in this case (**PDC Enforcement Case #59225**) while acknowledging they committed these violations, but the very "fix" they propose is legally insufficient, and they are fully aware of this deficiency. They just don't care. They seem to believe that if they cherry pick a handful of the out-of-state corporate PAC donors to their top 5 donors, that they can skate by the requirement to drill down deeper until they find three real people per PAC. They refuse to do this. One of the reasons they refuse to do this is because they don't want it to be known to the public that none of the top 3 donors ultimately behind their top 5 PAC donors (depending on how many layers of PACs they have to drill down) are actually from Spokane.

Not including the secret cash stash uncovered in a previous complaint I filed with the commissioner (**PDC Enforcement Case #58825** – which has received one of the more unbelievable responses I've ever seen from a PAC where they claim that everything looks okay on their end, so no answer for the sudden influx in mystery cash), this PAC is continuing to stonewall the actual donors in their top 5 contributors. Keep in mind, that list of top 5 contributors – and the top 3 non-PAC donors to those PAC – might change over time as the top 5 sub-PAC donor list changes.

According to their own disclosure on their mailers, website, videos, Facebook page, and other media IE, they claim their top donors are:

“(Top 5 Contributors: Spokane Firefighters Union PAC, SEIU Union WA State Council PAC, FUSE Votes, UFCW Local 1439, WA Conservation Voters Action Fund)”

Or, they have claimed their Top 5 Contributors are:

“Spokane Firefighters Union PAC, WE Education Association PAC, WA for All PAC, SEIU Union WA State Council PAC, UFCW Local 39 PAC”

And now they are claiming:

“Top 5 Contributors: Spokane Firefighters Union PAC, SEIU Union WA State Council PAC, UFCW 21 PAC, Fuse Votes, Washington Conservation Voters Action Fund. Top 3 Donors to PAC Contributors: SEIU, UFCW 21, Craig Mckibben”

Still, none of these mailers, ads, videos, brochures, FB page, or any other political communication from this PAC, which functions more like a Russian Nesting Doll of layers of PACs funded by other other PACs, is complaint. Everything they have done so far – particularly in the critical last 21 days of the election is illegal and non-compliant. Clearly, based on their responses, they are just going to ride out the election cycle and then sort out the business expense of paying the fine.

All of these contributors are PACs, which must in turn disclose their top three non-PAC donors (and drill deeper into THEIR PAC donors the same way). This has not been done once by this PAC and every single IE advertisement is in violation of this statute. I’ve attached some screen shots of the top 5 donors for some of these secretive PACs whose donors are being concealed in these IEs. Please note that when THESE PACS in turn are funded by other PACs, those PACS also must disclose their top 3 donors under the state’s campaign finance rules (as modified by Senator Billig’s bill). Here is what I detailed from the original complaint:

1. **Fuse Votes** – Top 3 contributors are also PACs:

a. **Washington State Council of Firefighters Support Team (FAST PAC)** - \$15k

i. **Washington State Council of Fire Fighters PAC** - \$13,500

ii. **Nich Gullickson** – Lynwood, WA - \$756.00

iii. **Cory Henson** – Walla Walla, WA - \$600 (below threshold of required top 3 listing)

b. **SEIU 775 Quality Care Committee PAC** - \$12,500

i. **SEIU Political Education Action Fund** – Washington DC - \$477,376

ii. **SEIU 775** – Seattle, WA - \$5,050.33

c. **Justice for All PAC** - \$10,000

i. **John Webber** – Seattle, WA - \$10,410.40

ii. **Karen Koehler** – Seattle, WA - \$10,196.33

iii. **Rebecca Roe** – Seattle, WA - \$9,266.40

2. SEIU Union WA State Council PAC

a. Secret, dark money donors - undisclosed

3. UFCW Local 1439 PAC

a. **UFCW 21** – Seattle, WA - \$210,000

b. **Barnard Iglitzin & Lavitt LLP** – Seattle WA - \$1,430

4. WA Conservation Voters Action Fund

a. **League of Conservation Voters Victory Fund** – Washington DC - \$100,000

b. **Craig McKibben** – Seattle, WA - \$25,000

c. **Linda Cornfield** – Seattle WA - \$25,000

5. Spokane Firefighters PAC

a. Mystery Secret unreported dark money donor (undisclosed, but currently under investigation by the PDC as referenced in **PDC Enforcement Case #58825**)

This is still a valid example set, but now, depending on when each mailer, ad, or brochure was sent, there are other top 3 donors undefined.

For example:

6. WA for All PAC

- a. Rick Steves – Edmonds, WA - \$20,000
- b. Maryanne Tagney – Seattle, WA - \$10,000
- c. Sheree Wen – Medina, WA - \$5,172

Meanwhile, the violations continue (and this is a very small sampling):

This entire Youtube Channel, which currently consists of 11 videos, none of which have the proper statements on them:

https://www.youtube.com/channel/UCKBY1trA_bmxZ849WGAa2lw

It is likely this PAC will delete the evidence shortly, so I have provided some screen captures of a few of these videos which clearly show their lack of proper disclosure.

There are many more examples of these illegal disclosures which are designed to conceal the true, out of state and certainly out-of-county donors behind this political campaign.

This is a well-funded, deep pocket political committee run by experience political insiders with years of history in politics and compliance as well as with plenty of resources to ensure they follow the law, yet they clearly never intended to follow the law even once with their independent expenditures in this case. The approach appears to be the recognition that dark money and concealing the sources of these secretive cash funds is well-worth the wrist slap warning or micro fine which the PDC may or may not impose. Well worth the risk. Based on their initial response to the PDC, it is clear they have no intention to follow the law in the future.

However, it is worth exposing the truth regardless of how often this crew continues to break the law. Someday the campaign finance laws will be enforced, even against well-funded, deep-pocket, shadowy dark money organizations like this.

I hope the PDC will investigate this one and look closely. This PAC is setting the road map for how to violate the law without any consequences.

Please let me know if you need additional information.

Best Regards,

Glen Morgan

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

Even as this well-funded Corporate sponsored secretive dark money PAC continues to violate the law, the public has a right to know who is behind it. Based on research, clearly the funding supporters don't live in Spokane, but who are they and why are they being concealed? The public has a right to know.

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

Top 3 donors of another one of the Top 5 PACs are screen captured from PDC website and attached.

Also, some additional screen capture images from just a handful of the 11 or more videos this campaign has produced are attached.

List of potential witnesses with contact information to reach them.

Everyone associated with 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.

Vote for a vibrant Spokane
Vote Ben Stuckart for Mayor

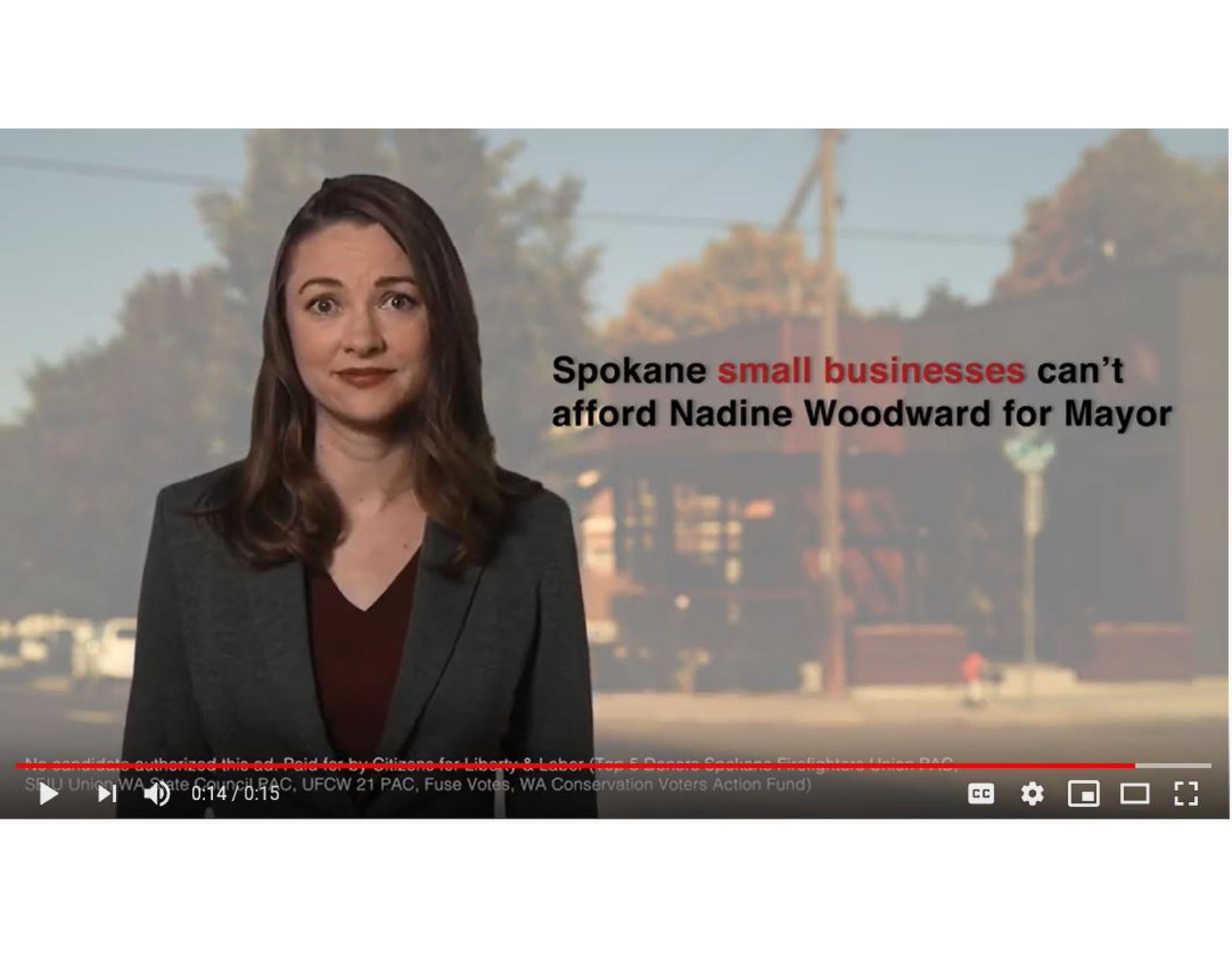
Ben
Stuckart

vote Ben Stuckart for Mayor.

No candidate authorized this ad. Paid for by Citizens for Liberty & Labor (Top 5 Donors Spokane Firefighters Union PAC, SFIU Union WA State Council PAC, UFCW 21 PAC, Fuse Votes, WA Conservation Voters Action Fund)

▶ | 🔊 0:14 / 0:15

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Spokane **small businesses** can't afford Nadine Woodward for Mayor

~~No candidate authorized this ad. Paid for by Citizens for Liberty & Labor (Top 5 Donors Spokane Firefighters Union PAC, SFU Union, WA State Council PAC, UFCW 21 PAC, Fuse Votes, WA Conservation Voters Action Fund)~~

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NAME	CITY	STATE	CASH/IN-KIND	AMOUNT
WEBBER JOHN D	SEATTLE	WA	Cash	\$10,410.40
KOEHLER KAREN K MS.	SEATTLE	WA	Cash	\$10,196.33
ROE REBECCA J MS.	SEATTLE	WA	Cash	\$9,266.40

Put public safety first
Vote Ben Stuckart for Mayor

Ben
Stuckart

to make real progress on these difficult issues.

No candidate authorized this ad. Paid for by Citizens for Liberty & Labor (Topic Donors Spokane Firefighters Union PAC, SFWU Union, WA State Council PAC, UFCW 21 PAC, Fuse Votes, WA Conservation Voters Action Fund)

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Apoya la Igualdad de derechos en todo Spokane
Apoya a Ben Stuckart para alcalde

Ben
Stuckart

Él si va a defender nuestros derechos.

~~Ningún candidato autorizó o aprobó este anuncio. Mensaje pagado por: Citizens for Liberty and Labor, P.O. BOX 18845 Spokane WA 99208 (5 Contributors)~~

~~principales: Spokane Firefighters Union PAC, SIEU Union WA State Council PAC, Fuse Votes, WA Conservation Voters Action Fund, UFCW 21 (PAC)~~

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Don't let developers **buy our
next Mayor and Council President**

mayor and council president.

No candidate authorized this ad. Paid for by Citizens for Liberty & Labor (Top 5 Donors Spokane Firefighters Union PAC, SEIU Union WA State Council PAC, UFCW 21 PAC, Fuse Votes, WA Conservation Voters Action Fund)

Outside developers are spending record amounts to elect Woodward for Mayor (pdc.wa.gov)

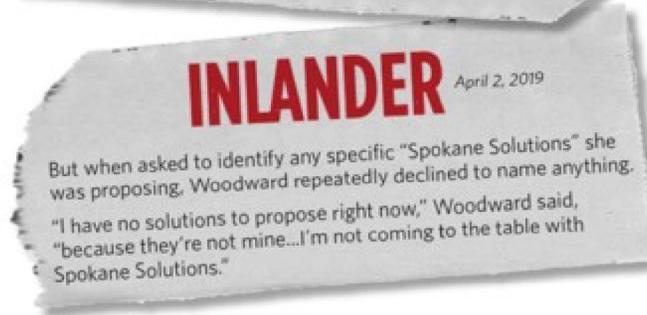
Nadine Woodward has already suggested spending our tax dollars on development outside the city limits if she becomes Mayor.

She will bring Seattle's sprawl and traffic to Spokane at OUR expense.

Now we know whose Solutions she will be pushing if elected.

We can't afford a mayor who will put developers first and ignore us. We can't afford Nadine Woodward.

Don't let developers buy off OUR Mayor.



**Vote Ben Stuckart for Spokane Mayor—
a champion for us, not developers!**