

Complaint Description

[Glen Morgan](#) (Tue, 22 Oct 2019 at 12:11 PM)

To whom it may concern,

It has come to my attention 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 when they come to 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 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.

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)"

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) :

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**)

Of course, there are two Washington, DC based PACs referenced above which also must disclose their top three donors in all the IEs produced by this PAC. I didn't take the additional time to expose those additional secretive donors, but I'm sure this well funded PAC can get to the bottom of it and report those additional (currently secret) donors to the public.

As examples of these violations (and this is a very small sampling):

– linked here on Youtube:

<https://www.youtube.com/watch?v=ZmRxUI9NuYg&>

This was a 30second ad also aired on television. The title is "Don't Let Developers Buy Our Next Mayor" and the partial incomplete illegal disclosure is at the end of the video – hiding nearly all the secretive dark money donors as explained above.

Here is another example on a website managed by this PAC as an IE:

<https://www.developersfornadine.com/>

In case they delete or take down this site, I have attached a screen grab of the incomplete and illegal disclosure found here as well.

Another example is an ad run by this PAC opposed to Nadine Woodward and recommending voters support Ben Stuckart, which I have attached to this complaint as an example. This one also has the legally deficient disclaimer at the bottom.

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.

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 secretive, dark money PACs like this one which is largely funded by out of state and certainly out of county cash should be required to follow the law. Despite the fact they have lots of cash and scoff at the transparency and campaign finance rules in this state, they should still be required to follow the law.

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

Examples referenced in the complaint are attached.

List of potential witnesses with contact information to reach them.

In addition to all the committee members involved in this PAC, there may be some need to audit the vendors and donors to this campaign. It is a tangled web of hidden, secretive dark money cash...

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.

DATE	NAME	CITY	STATE	CASH	CYCLE	ORGANIZATION	PROFESSION	AMOUNT	STATUS
09/20/2019	LEAGUE OF CONSERVATION VOTERS VICTORY FUND	WASHINGTON	DC	Cash	Full election cycle			\$100,000.00	C3
07/03/2019	MCKIBBEN CRAIG	SEATTLE	WA	Cash	Full election cycle		RETIRED	\$25,000.00	C3
06/25/2019	CORNFIELD LINDA	SEATTLE	WA	Cash	Full election cycle		RETIRED	\$25,000.00	C3
06/25/2019	OREGON GIVING BACK FUND	PORTLAND	OR	Cash	Full election cycle			\$20,000.00	C3
09/19/2019	GOLDMAN PETER	SEATTLE	WA	Cash	Full election cycle	WA FOREST LAW CENTER	ATTORNEY	\$15,000.00	C3

Now we know whose "Solutions" Nadine will be pushing if elected. We can't afford a mayor who will put developers first and ignore us. DON'T LET DEVELOPERS BUY OUR NEXT MAYOR.

No candidate authorized this ad. It is paid for by Citizens for Liberty and Labor, PO Box 18845, Spokane, WA 99228 (Top 5 Contributors: Spokane Firefighters Union PAC, SEIU Union WA State Council PAC, UFCW 21 PAC, Fuse Votes, Washington Conservation Voters Action Fund)

Amounts shown are aggregate totals of cash and in-kind contributions.

NAME	CITY	STATE	CASH/IN-KIND	AMOUNT
WASHINGTON STATE COUNCIL OF FIRE FIGHTERS	OLYMPIA	WA	In kind	\$13,500.00
GULLICKSON NICH	LYNWOOD	WA	Cash	\$756.00
HENSON CORY	WALLA WALLA	WA	Cash	\$600.00
HART KEVIN	BATTLE GROUND	WA	Cash	\$540.00

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WASHINGTON STATE COUNCIL OF FIREFIGHTERS SUPPORT TEAM (FAST PAC)	OLYMPIA	WA	Cash	\$15,000.00
SEIU 775 QUALITY CARE COMMITTEE	SEATTLE	WA	Cash	\$12,500.00
JUSTICE FOR ALL PAC	OLYMPIA	WA	Cash	\$10,000.00
JESIOLOWSKI JUDITH	BELLEVUE	WA	Cash	\$8,000.00
THOMPSON DAVID	BELLEVUE	WA	Cash	\$8,000.00

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

Amounts shown are aggregate totals of cash and in-kind contributions.

NAME	CITY	STATE	CASH/IN-KIND	AMOUNT
SERVICE EMPLOYEES INTERNATIONAL UNION POLITICAL EDUCATION AND ACTION FUND	WASHINGTON	DC	Cash	\$477,376.85
SEIU 775	SEATTLE	WA	In kind	\$5,050.33
SMALL CONTRIBUTIONS			Cash	\$100.00

Amounts shown are aggregate totals of cash and in-kind contributions.

NAME	CITY	STATE	CASH/IN-KIND	AMOUNT
UFCW 21	SEATTLE	WA	Cash	\$195,000.00
UFCW 21	SEATTLE	WA	In kind	\$15,101.68
BARNARD IGLITZIN & LAVITT LLP	SEATTLE	WA	In kind	\$1,430.00

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

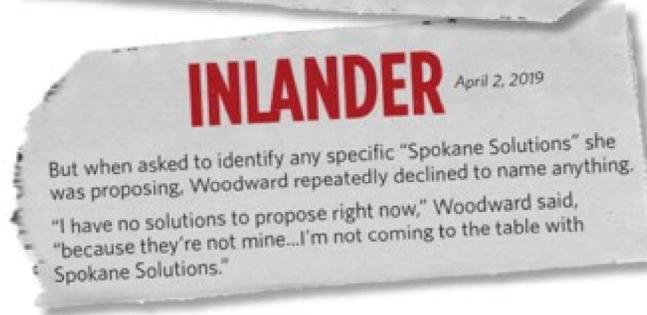
Nadine Woodward has already suggested spending our tax dollars on development outside the city limits if she becomes Mayor.

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!**