

Complaint Description

[Sandra Robson](#) (Fri, 15 Nov 2019 at 1:46 PM)

Please see attached pdf documents (2), one with my full complaint, and one with Exhibit A containing related screenshot photos.

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

The public's trust is broken if a candidate were to use campaign funds for personal use. The public has a right to know if Jay Rodne, in fact, used campaign surplus funds to pay for the registration/filing fee for PacRim Bridges LLC, a business he and WA state Senator Doug Ericksen founded, which Mr. Rodne registered with Washington's Office of the Secretary of State that shows a registration/filing date of 11/28/17.

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

- Two screenshots showing the C4 "Cash Receipts and Expenditure" report dated 12/11/17 for the report period 11/1/17 to 11/30/17 for Jay Rodne's "Friends for Jay Rodne Surplus" account.
- Screenshot of Jay Rodne's customer receipt he received from Washington's Office of the Secretary of State for his \$200.00 payment he made on 11/24/17 for the registration fee charged to register the business, Pac Rim Bridges LLC.
- Two screenshots showing the Certificate of Formation for Pac Rim Bridges LLC filed with Washington's Office of the Secretary of State

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

Public Disclosure Commission
711 Capitol Way S. #206
PO BOX 40908
Olympia, WA 98504-0908

To Whom it May Concern:

I have reason to believe that former Washington state representative Jay Rodne made an expenditure in November of 2017, using monies from his "Friends for Jay Rodne Surplus" account, for a purpose that, to my best knowledge, would be considered to be personal in nature which would appear to be in violation of WAC 390-16-238.

There may be other state statutes that I am unaware of which apply to this potential violation, but since my knowledge on Washington state campaign finance law is limited, I leave that up to your agency's expertise to further address.

According to the C4 "Cash Receipts and Expenditure" report dated 12/11/17 for the report period 11/1/17 to 11/30/17 for Jay Rodne's "Friends for Jay Rodne Surplus" account, Mr. Rodne made a \$200.00 expenditure with a "paid date" of 11/27/17. The purpose and/or description of that expense was listed as "fees for c1." I have attached a screenshot of that expense in Exhibit A accompanying this complaint. The link to the C4 report I referenced can be found at:

<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=100803855>

WAC 390-16-238 states, in-part:

"(1) Except as specifically allowed by chapter 42.17A RCW, any expenditure of a candidate's campaign funds that is not directly related to the candidate's election campaign is a personal use of campaign funds prohibited under RCW 42.17A.445.

"(2) An expenditure of a candidate's campaign funds shall be considered personal use if it fulfills or pays for any commitment, obligation or expense that would exist irrespective of the candidate's election campaign."

RCW 42.17A.430 specifically outlines the eight ways in which the surplus funds of a candidate or a candidate's authorized committee may dispose of surplus funds. One of those eight listed ways to dispose of surplus campaign funds is to hold the surplus campaign funds in a separate account for non-reimbursed public office-related expenses or as provided in RCW 42.17A.430, and report any such disposition in accordance with RCW 42.17A.20.

After reviewing those eight ways to dispose surplus campaign funds, I do not believe that the \$200.00 payment Mr. Rodne made in November of 2017 to Washington's Office of the Secretary of State (where he used funds from his "Friends for Jay Rodne Surplus" account) applies to any of those eight ways.

Also, after doing research, I do not see any other possibilities which could correlate to that \$200.00 payment made to the Office of the Secretary of State dated November 27, 2017 on the C4 report referenced above.

It's my understanding from speaking with a PDC staff person on November 14, 2019, that there are no fees associated with any candidate or PAC for filing a C1 registration form.

Also, the \$200.00 expenditure amount does not appear to be related to any potential candidate filing fee (filing week is in May) which for state legislature candidates, would be paid to

Washington's Office of the Secretary of State, because that fee amount then would have been significantly higher than \$200.00.

To the best of my abilities, I cannot find any evidence to substantiate that the purpose for Mr. Rodne's payment of \$200.00 using his "Friends for Jay Rodne Surplus" account he made to Washington's Office of the Secretary of State, was for anything related to his stated purpose which was, "fees for C1."

However, I was able to find substantiation for the possibility that Jay Rodne may have used funds from his "Friends for Jay Rodne Surplus" account to pay a \$200.00 fee to register his business, PacRim Bridges LLC, with Washington's Office of the Secretary of State.

In reviewing Mr. Rodne's \$200.00 expenditure listed on his C4 report dated 12/11/17 for the report period 11/1/17 to 11/30/17, I am cognizant of the fact that, according to records I obtained from Washington's Office of the Secretary of State, Mr. Rodne and Washington state Senator Doug Ericksen are listed as individual "Governors" of a business named PacRim Bridges LLC which was registered with the Office of the Secretary of State on November 28, 2017. According to those records, Jay Rodne is the listed registered agent for PacRim Bridges LLC. I have attached a screenshot of the registration in Exhibit A accompanying this complaint.

The public records recently released to me which I obtained from Washington's Office of the Secretary of State show there was a \$200.00 credit card payment made by Jay Rodne for the registration fee charged for registering the PacRim Bridges LLC business with the Office of the Secretary of State. I have included a screenshot of the Certificate of Formation record in Exhibit A accompanying this complaint.

Because of what I've outlined above, I believe it is possible that Jay Rodne may have used \$200.00 from his "Friends for Jay Rodne Surplus" account to pay Washington's Office of the Secretary of State for the \$200.00 registration fee for registering the PacRim Bridges LLC business in November of 2017.

I request that your agency investigate this matter to determine the purpose of that \$200.00 expenditure listed on the C4 "Cash Receipts and Expenditure" report dated 12/11/17 for the report period 11/1/17 to 11/30/17 for Jay Rodne's "Friends for Jay Rodne Surplus" account.

Former state representative Jay Rodne served multiple terms as a Washington state representative, so he certainly has had plenty of experience to give him ample understanding of campaign finance law relating to the disposition of surplus account funds.

If it turns out to be the case that the PDC finds that Mr. Rodne used funds from his "Friends for Jay Rodne Surplus" account to pay the registration fee to register PacRim Bridges LLC, a personal business he has with Senator Ericksen where presently they are registered as foreign agents doing consulting work for the Kingdom of Cambodia under an annual \$500,000 contract, I hope Mr. Rodne would then be assessed the maximum penalty/fine possible for such a violation of state law under WAC 390-16-238 and any other applicable state law.

Thank you for your attention to this matter.

Respectfully submitted,

Sandy Robson

EXHIBIT A

Screenshot of Page 1 of the Certificate of Formation for Pac Rim Bridges LLC filed with Washington's Office of the Secretary of State

Done CERTIFICATE OF FORMATION 201...

Office of the Secretary of State
Corporations & Charities Division

Filed
Secretary of State
State of Washington
Date Filed: 11/28/2017
Effective Date: 11/28/2017
UBI #: 604 192 364

CERTIFICATE OF FORMATION

UBI NUMBER

UBI Number:
604 192 364

BUSINESS NAME

Business Name:
PAC RIM BRIDGES, LLC

REGISTERED AGENT CONSENT

To change your Registered Agent, please delete the current Registered Agent below.
Registered Agent Consent (Check One):
 I am the Registered Agent. Use my Contact Information.
 I am not the Registered Agent. I declare under penalty of perjury that the WA Limited Liability Company has in its records a signed document containing the consent of the person or business named as registered agent to serve in that capacity. I understand the WA Limited Liability Company must keep the signed consent document in its records, and must produce the document on request.

RCW [23.95.415](#) requires that all businesses in Washington State have a Registered Agent. Some of this information is prepopulated from information previously provided. Please make changes as necessary to provide accurate information.

REGISTERED AGENT [RCW 23.95.410](#)

Registered Agent Name	Street Address	Mailing Address
JAY RODNE	34815 SE KINSEY ST, APT. F101, SNOQUALMIE, WA, 98065-5204, USA	34815 SE KINSEY ST, APT. F101, SNOQUALMIE, WA, 98065-5204, USA

CERTIFICATE OF FORMATION

Do you have a Certificate of Formation you would like to upload? - **Yes**

Certificate of Formation
PACRIM BRIDGES LLC Certificate of Formation 11-24-17.pdf

PRINCIPAL OFFICE

This document is a public record. For more information visit www.sos.wa.gov/corps

Phone:
425-890-3336

Email:
JAY_RODNE@COMCAST.NET

Street Address:
7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA

Mailing Address:
7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA


DURATION

Duration:
Perpetual

EFFECTIVE DATE

Effective Date:
11/24/2017

Screenshot of Pages 2 and 3 of the Certificate of Formation for Pac Rim Bridges LLC filed with Washington's Office of the Secretary of State

Done CERTIFICATE OF FORMATION 201... 

Phone:
425-890-3336

Email:
JAY_RODNE@COMCAST.NET

Street Address:
7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA

Mailing Address:
7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA

DURATION

Duration:
Perpetual

EFFECTIVE DATE

Effective Date:
11/24/2017

EXECUTOR

Title	Executor Type	Entity Name	First Name	Last Name	Address
EXECUTOR	INDIVIDUAL	PACRIM BRIDGES	JAY	RODNE	7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA

FILING CORRESPONDENCE ADDRESS

Attention:
DOUG ERICKSEN

Email:
ERICKSENDJ@AOL.COM

Address:
7028 DAHLBERG RD, FERNDAL, WA, 98248-9744, USA

Note: If you would like to have your document mailed to an address other than the registered agent's address, please provide the information in this section.

UPLOAD ADDITIONAL DOCUMENTS

Do you have additional documents to upload? No

AUTHORIZED PERSON

I am an authorized person.

Person Type:
INDIVIDUAL

First Name:
JAY

Last Name:
RODNE

Title:
REGISTERED AGENT

This document is a public record. For more information visit www.sos.wa.gov/corps

This document is hereby executed under penalty of law and is to the best of my knowledge, true and correct.

Screenshot of Jay Rodne's customer receipt for the \$200.00 credit card payment made on 11/24/2017 to Washington's Office of the Secretary of State for the filing fee to register Pac Rim Bridges LLC

Done
RECEIPT.PDF

Secretary of State
Chris Wyman

Washington Secretary of State
Corporations and Charities Division
801 Capitol Way South
PO Box 40234
Olympia, WA 98504-0234
(360) 725-0377
corps@sos.wa.gov

Customer Receipt

Payment Transaction:

Work Order #: 2017112400013518
Received Date: 11/24/2017
Total Paid: \$200.00


Payment Details:

Cardholder Name / Payer Name	Payment Type	Identifying Number	Payment Date	Amount
JAY RODNE	MASTER CARD		11/24/2017	\$200.00

Transaction Details:

Name	UBI # / Registration #	Service Type	Amount	Processing Fee
PAC RIM BRIDGES, LLC		CERTIFICATE OF FORMATION WITH INITIAL REPORT	\$180.00	\$20.00

Screenshot of Page 1 of Jay Rodne's "Friends for Jay Rodne Surplus" account C4 report for report period 11/1/17 to 11/30/17

 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828		SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES	C4 (397)	PDC OFFICE USE 100803855 12-11-2017
Candidate or Committee Name (Do not abbreviate. Include full name) JAY RODNE (Friends for Jay Rodne Surplus)				
Mailing Address PO Box 2848		City Issaquah, WA		
Zip + 4 98027	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2021	*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)?	
Report Period Covered From (last C-4) 11/01/17 To (end of period) 11/30/17	Final Report? Yes No X		*See next page Yes No	
RECEIPTS				
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)		\$	18,947.63	
2. Cash received (From line 2, Schedule A)		\$	0.00	
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).....			0.00	
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)			18,947.63	
9. Total pledge payments due (From line 2, Schedule B)		0.00		
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)			17,264.61	
11. Total cash expenditures (From line 4, Schedule A)			1,666.86	
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).....			1,666.86	
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).....			18,931.47	
CANDIDATES ONLY		CASH SUMMARY		
Won Lost Unopposed Name not on ballot		18. Cash on hand (Line 8 minus line 17)		
Primary election <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			16.16	
General election <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			0.00	
Treasurer's Daytime Telephone No.: (425) 269-5429		19. Liabilities: (Sum of loans and debts owed)		
		20. Balance (Surplus or deficit) (Line 18 minus line 19)		
		16.16		
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 JAY RODNE		Treasurer's Signature Heidi L Huntington		
Date 12/11/17		Date		

Screenshot of Page 2 of Jay Rodne’s “Friends for Jay Rodne Surplus” account C4 report for report period 11/1/17 to 11/30/17 showing (highlighted in red) the \$200.00 expenditure in question with a date paid of 11/27/17

SCHEDULE A
 to C4
(11-93)

CASH RECEIPTS AND EXPENDITURE

Candidate or Committee Name (Do not abbreviate. Use full name.) Report Date
JAY RODNE (Friends for Jay Rodne Surplus) 11/01/17 11/30/17

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

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 0.00

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:

- 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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 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
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3. EXPENDITURES

- 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.
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- 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	55.56
11/03/17	EASTSIDE SELF STORAGE 1410 BOALCH ROAD NW NORTH BEND, WA 98045		Storage for campaign materials	345.00
11/08/17	SOUND ACCOUNTING SOLUTIONS 2190 E HECLA DR. UNIT B LOUISVILLE, CO 80027		treasury work	450.00
11/22/17	VERIZON WIRELESS MOUNTAIN VIEW , WA		Internet and telephone use	616.30
11/27/17	WASHINGTON SECRETARY OF STATE PO Box 40220 Olympia, WA 98504-0220		fees for cl	200.00
Total from attached pages				\$ 0.00

4. TOTAL CASH EXPENDITURES Enter also on line 11 of C4 \$ 1,666.86