

State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 (360) 753-1111 • FAX (360) 753-1112 **Toll Free 1-877-601-2828 • E-mail: <u>pdc@pdc.wa.gov</u> • Website: <u>www.pdc.wa.gov</u>**

BEFORE THE PUBLIC DISCLOSURE COMMISSION OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH RCW 42.17A

PDC Case 66161

Joshua Freed

Respondent.

Report of Investigation

I. Background, Complaint and Allegations

- 1.1 On August 8, 2019, Joshua Freed (Freed) registered with the PDC declaring candidacy for Office of Governor, establishing the Joshua Freed for Governor (Campaign) for the 2020 election, selecting the Full Reporting Option and listing party preference as Republican.
- 1.2 Mr. Freed has previously filed with the PDC as a candidate for Bothell City Council, having been elected to that office in 2005, where he served on the City Council and as Mayor. He was re-elected to office in 2009 and 2013.
- 1.3 On February 21, 2020, William Casey filed a complaint with the PDC stating "Candidate for Governor Joshua Freed has violated RCW 42.17A.445(3) and WAC 390-16-226. Per state law a candidate may only be repaid for personal loans made to their campaign up to \$6000 per election. Mr. Freed loaned his campaign \$500,000 on 9/14/2019 and was repaid \$500,000 on 1/31/2020." Exhibit #1
- 1.4 On February 22, 2020, Lorie Walker filed a complaint with the PDC stating, "The loan Mr. Freed made to his campaign enabled him to gain support by the Washington State Republican Caucus, before other candidates could. While loans are permitted, loan repayments of over \$6,000 are not allowed per RCW. His loan of \$500,000 and subsequent repayment nearly four months later game him a significant advantage over other candidates." Exhibit #2
- 1.5 In the Respondent's initial response, received March 18, 2020, Mark Lamb, representing the Campaign, requested an extension until April 18, 2020 for a full response, due to the recently ordered quarantine and for personal reasons.
- 1.6 PDC staff granted the Campaign an extension until April 18, 2020 to provide a response. No response was received by that date.

1.7 On April 27, 2020, the PDC opened a formal investigation and held an Initial Hearing in this matter. Mark Lamb participated in the hearing on behalf of the Campaign.

II. Investigative Findings

- 2.1 PDC statutes, rules and reporting requirements state that a person becomes a candidate when they do one of these things: accept a contribution or spend money for that person's campaign; reserve space or purchase advertising to promote that person's candidacy; authorize someone else to do any of such activities on behalf of that person; state publicly that the person is seeking office; or file a declaration of candidacy.
- 2.2 Candidates who selected the Full Reporting option, and are participating in the 2020 election, are required to comply with the following reporting requirements:
 - a. Monetary contributions must be deposited into the committee bank account within five business days of receipt, and the Campaign is required to file one Monetary Contributions Report (C-3 report) for each bank deposit. Monthly C-3 reports are due by the 10th of each month disclosing contributions received and deposited during the previous calendar month, and weekly C-3 reports are required every Monday beginning June 1, for contributions received and deposited the previous five business days.
 - b. Monthly Summary Full Campaign Contributions and Expenditures reports (C-4 reports) are required to be filed January 1 through May 31 and are due by the 10th of the month if \$200 in contributions has been received or \$200 in expenditures have been made since the last C-4 report was filed.
- 2.3 On October 10, 2019, the Campaign filed a C-3 report disclosing the receipt of a \$500,000 candidate loan from Joshua Freed on line 1c, stating the loan was received and deposited on September 14, 2019. The Campaign completed a Schedule L Loan Document, attached to the C-3 report when filed, as required for a candidate making a candidate loan. The Schedule L disclosed the Campaign received a \$500,000 loan from Joshua Freed on September 14, 2019, which was designated for the 2020 primary election by selecting the box on the report and indicated a zero percent annual interest rate was being charged. Exhibit #3
- 2.4 On February 10, 2020, the Campaign filed the Summary Full Campaign Contributions and Expenditures (C-4) report for January 2020, disclosing \$95,201 in monetary contributions received, plus \$661.84 for in-kind contributions received and \$521,765.47 in total expenditures made. The C-4 report expenditures included a \$500,000 payment made by the Campaign to Joshua Freed on January 31, 2020, describing the expenditure as "Loan Received" from Freed on September 14, 2019. In addition, the January 2020 C-4 report included a completed Schedule L, Section 2 for Loan Payments disclosing a \$500,000 expenditure made to Joshua Freed on January 31, 2020 as a loan repayment. Exhibit #4
- 2.5 **RCW 42.17A.445** states repayment of loans made by the individual to political committees shall be reported pursuant to RCW 42.17A.240, and that contributions received by the candidate may not be used to repay more than \$6,000 per election in 2020 for "loans ... made by the candidate to the candidate's own authorized committee."
- 2.6 WAC 390-16-226(1) provides that only candidate loans recorded in a written loan agreement executed at the time of the loan and properly reported are eligible to be repaid by a candidate's campaign.

- 2.7 On June 11, 2020, Mark Lamb responded to the complaint on behalf of Campaign, stating "As discussed at the pre-hearing, the campaign erroneously classified the initial contribution as a loan on September 14, 2019." **Exhibit #5**
- 2.8 The responses on behalf of the Campaign do not acknowledge a loan had actually been made by Freed or received by his authorized committee, notwithstanding the Campaign's October 10, 2019, C-3 report, disclosing a \$500,000 candidate loan and attaching a completed Schedule L Loan Agreement, nor the February 10, 2020 C-3 report, disclosing a \$500,000 expenditure repaying the loan. No loan document was ever produced by the Campaign or verified or confirmed to have been executed, despite requests from staff.
- 2.9 In the response, Lamb stated that in the "ensuing months the campaign realized this characterization resulted in a large liability being shown to the public reviewing its finances on the PDC website. In reality, the campaign was never in debt and in fact Mr. Freed was donating large sums of money to support his own campaign. Because of this persistent misconception, the campaign cleared out the mischaracterized contribution on 1/31/2020. The same day Mr. Freed donated \$50,000 to his campaign and has subsequently contributed an additional \$155,500 for a total of \$205,500."
- 2.10 On June 30, 2020, the Campaign filed an amended C-3 report amending the initial C-3 report filed October 10, 2019 and disclosing that a \$500,000 monetary contribution had been received from Freed on September 14, 2019. The amended C-3 report retroactively reclassified the \$500,000 candidate loan from Joshua Freed as a candidate contribution, more than 260 days after the original C-3 report was filed. Exhibit #6
- 2.11 In June 2020, the Campaign amended the January 2020 C-4 report three times, with the expenditure made to Joshua Freed described as repayment of the "Loan Received" in two of those amended reports. The third amended January 2020 C-4 report was filed June 30, 2020, changing the \$500,000 expenditure description to "Refund of Contribution". Exhibit #7
- 2.12 On July 21, 2020, the Campaign filed its fourth amended January 2020 C-4, listing a \$450,000 expenditure, rather than \$500,000, made January 31, 2020 to Joshua Freed, described as "Refund of Contribution." Exhibit #8
- 2.13 On July 21, 2020, the Campaign provided partial copies of bank statements in response to staff's request. The copies of the bank statements listed a September 6, 2019
 "Telephone Transfer Credit" of \$500,000 into the Freed for Governor account. In addition, the bank statements listed a December 31, 2019 "Telephone Transfer Debit" of \$450,000 from the Freed for Governor account. To date, the Campaign has not provided the full bank statements as requested. Exhibit #9
- 2.14 All reports listed above were electronically filed, certified, and signed by Joshua Freed (Candidate) and Jeff Davis (Ministerial Treasurer).

III. Scope

- 3.1 PDC staff reviewed the following:
 - The complaints and exhibits filed by William Casey and Lorie Walker.
 - Telephone conversations and email communications between PDC staff and Mark Lamb (counsel for the Campaign).
 - C-1, C-3 and C-4 reports filed by Campaign covering the 2020 election.

- The PDC database for Campaign contribution and expenditure information covering the 2020 election cycle.
- Campaign bank records for Freed for Governor.
- News reports posted on seattletimes.com February 14, 2020 and updated February 25, 2020 titled "GOP gubernatorial candidate Joshua Freed goes back and forth on \$500K campaign loan." **Exhibit #10**

3.2 Chronology of PDC staffs attempted contacts with the Campaign concerning the complaint:

- PDC staff sent an e-mail March 3, 2020 with the complaints attached to the Campaign email address listed on the campaign registration. A response was received from Mark Lamb March 18, 2020, noting his firm had been retained by the Freed Campaign to address the complaint. Lamb requested an extension until April 18, 2020.
- PDC staff responded to Lamb on March 24, 2020, approving the request.
- PDC Compliance Officer Alice Fiman e-mailed Lamb on April 14, 2020, noting the response was due April 18, 2020. No response was received.
- Fiman e-mailed Lamb a Notice of Case Status Review (Initial Hearing) for Monday, April 27 at 11 a.m.
- Lamb e-mailed PDC staff the morning of April 27, requesting to participate remotely in the April 27 hearing.
- During the April 27 hearing, Lamb requested an extension due to the Governor's Stay Home order, stating he was unable to meet with his client. He stated he would have the response to the PDC four days after the order was lifted.
- On June 4, PDC staff emailed Lamb, noting the response would be due June 10, 2020.
- Lamb emailed PDC staff June 11, 2020, providing the initial response.
- PDC staff emailed Lamb on June 22, June 30, July 7, and July 8 requesting Lamb provide the campaign's bank records for September 2019, January 2020, and February 2020, to document the movement of the \$500,000 at issue.
- Lamb responded June 24 and July 8, noting his objection to providing the records. **Exhibit #11**
- A phone call took place on July 17, 2020 between PDC General Counsel Sean Flynn and Lamb. Lamb stated to Flynn he would provide the records by July 20, 2020. Redacted records were provided July 21, 2020.
- On July 22, PDC staff e-mailed Lamb, requesting unredacted bank records by July 23, 2020. No response was received. **Exhibit #12**

IV. Statutes and Rules

RCW 42.17A.145 requires every report and statement required under RCW 42.17A shall identify the person preparing it, and shall be certified as complete and correct, both by the person preparing it and by the person on whose behalf it is filed.

RCW 42.17A.235 provides that a treasurer or candidate shall preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred, with (9) requiring all reports filed pursuant to subsection (1) or (2) be certified as correct by the candidate and the treasurer.

RCW 42.17A.240 require candidates under the Full Reporting Option to file timely, accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. Beginning June 1st for every participant in an election, C-4 reports are required 21 and 7 days before each election, and a post-election C-4 report in which the committee receives contributions or makes expenditures, and in the month following the election.

RCW 42.17A.445 states repayment of loans made by the individual to political committees shall be reported pursuant to RCW 42.17A.240. However, contributions may not be used to reimburse a candidate for loans totaling more than dollar amounts adjusted for inflation by rule of the commission adopted under the authority of RCW 42.17A.125. Current dollar amounts are listed in WAC 390-05-400.

WAC 390-16-226 (1) provides that only loans which are recorded in a written loan agreement executed at the time of the loan and properly reported may be repaid by a candidate or political committee. The rule also states the amount of campaign contributions which may be used to repay a loan made by the candidate to the candidate's own political committee or campaign, or to repay a commercial loan to a candidate's own political committee or campaign where the candidate is the borrower or guarantor, is limited to the loan repayment limit in RCW 42.17A.445(3) as adjusted by WAC 390-05-400. For purposes of the loan repayment limit, these loans are aggregated for each primary, general, special or recall election and must be designated accordingly by the candidate at the time the loan is made.

WAC 390-05-400 allows, pursuant to the authority in RCW 42.17A.125, the commission to revise the monetary contribution limits and reporting thresholds and code values of the act to reflect changes in economic conditions. The current (2020) reimbursement of candidate for loan to own campaign is \$6,000.

Respectfully submitted this 2 day of July 2020.

Alice Fiman PDC Compliance Officer

List of Exhibits

- Exhibit #1 Complaint filed by William Casey
- **Exhibit #2** Complaint filed by Lorie Walker
- Exhibit #3 October 10, 2019 C-3 report disclosing the receipt of a \$500,000 candidate loan from Joshua Freed
- Exhibit #4 January 2020 C-4 report filed February 2020
- Exhibit #5 June 11, 2020 response from Mark Lamb on behalf of Campaign
- Exhibit #6 Amended C-3 report, filed June 2020
- Exhibit #7 Three amended January 2020 C-4s, filed June 2020
- Exhibit #8 Fourth amended January 2020 C-4, filed July 21, 2020
- Exhibit #9 July 21, 2020 provided partial copies of bank statements
- Exhibit #10 Seattle Times news report
- Exhibit #11 June 24 and July 8 e-mails from Mark Lamb
- **Exhibit #12** July 22 email from PDC staff to Mark Lamb, requesting unredacted bank records

Exhibit 1

Complaint Description

William Casey (Fri, 21 Feb 2020 at 9:01 AM)

To whom it may concern:

Candidate for Governor Joshua Freed has violated <u>RCW 42.17A.445(3)</u> and <u>WAC 390-16-226</u>. Per state law a candidate may only be repaid for personal loans made to their campaign up to \$6000 per election. Mr. Freed loaned his campaign \$500,000 on 9/14/2019 and was repaid \$500,000 on 1/31/2020.

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

The violation breaks the trust of voters of the candidate's ability to uphold campaign finance law.

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

C3 reporting the original loan - Report # 100936492

C4 reporting the loan repayment - Report # 100957543

List of potential witnesses with contact information to reach them.

Candidate Joshua Freed - joshua@freedforgovernor.com

Treasurer Jeff Davis – jeffdavis@madisoncorp.biz

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.

Exhibit 1 - 1 of 11

PUBLIC	DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828	MON	H RECE IETARY ITRIBUT	-	((1/02)	3	ACE FOR OFFICE USE 0936492 -10-2019
	or Committee Name (Do not abbreviate.	. Use full nan	ne.)					
	for Governor)							
Mailing Ad								
	ffice Box 2141							
City		Zip + 4		Office Sought (canc GOVERNOR	lidates	5)	Election Dat	le
Bothel	L , WA ARY CONTRIBUTIONS DEPOSITED IN	98041					2020	
Date Received		TACCOUNT					Amount	Total
	a. Anonymous							
09/14/19	b. Candidate's personal funds depo c. Loans, notes, security agreemen	ts. Attach Sc	hedule L				\$500,000.00	
	d. Miscellaneous receipts (interest,	refunds, auct	ions, other). Att	ach explanation				
	e. Small contributions \$25.00 or les	s not itemized	and number of	persons giving (persor	is)		
2. CONTRI Date Received	IBUTIONS OVER \$25.00 Contributor's Name, Address, City	, State, Zip		ns of more than \$100: [*] s Name, City and State	P R I	G E N	Amount	Aggregate [*] Total
09/14/19	ALLEN HAYWARD 1970 Trosper Road SW, # Tumwater, WA 98512	ŧ₽101	Retired Tumwater, OccupationRI		X		\$101.00	\$101.00
09/14/19	KEVIN TAYLOR 15 Lake Bellevue Drive, Bellevue, WA 98005	#102		evelopment	x		\$2,000.00	\$2,000.00
09/14/19	KEVIN TAYLOR 15 Lake Bellevue Drive, Bellevue, WA 98005	#102	OccupationPI Taylor De Bellevue	evelopment		x	\$2,000.00	\$2,000.00
			OccupationPI	·				
09/14/19	ANGELA TAYLOR 15 Lake Bellevue Drive, Bellevue, WA 98005	/ #102	Homemaker Bellevue,	. WA	X		\$2,000.00	\$2,000.00
09/14/19	ANGELA TAYLOR 15 Lake Bellevue Drive,	#102	OccupationHC Homemaker			x	\$2,000.00	\$2,000.00
	Bellevue, WA 98005		Bellevue, Occupation ^{HC}				<i>\$2,000.00</i>	<i>42,000.00</i>
3. TOTAL	Check here if additional pages are attached			Amo attach	Sub-t ount fi ed pa	om	\$508,101.00 \$0.00	*See reverse for details.
Sum of pa	arts 1 and 2 above. Enter this amount in						\$508,101.00	
4. Date of I	Deposit			I certify that this report is Treasurer's Signature	true ai	nd co		y knowledge Date
	14/19 S Daytime Telephone No.: (206)61	7-9762		Jeff Davis				.0-10-2019
			1				Exhibit 1	- 2 of 11

LOANS				SCHE TO C3 OR C4		Page 2	
Candidate of	or Committee Name				(12)00)	Report Dat	е
(Freed for 1 MONETA	r Governor) RY OR IN-KIND LOAN RECEIVED. Loans are (considered	contribution	s and ar	e subject to any applic	able limit	
Date Loaned 09/14/19	Lender's Name and Address JOSHUA FREED	P G R E	Amount of 500,00	Loan	Annual Interest Rate 0%	Repayment Schedule	Date Due
	Post Office Box 2141 Bothell, WA 98041					Lender's Occupation a Name, City & State of	
If mone	 tary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.	-				·······	
Name and A	ddress of Each Loan Endorser, Co-Signer		mount Lial (Same as Amoun	Loan	Aggregate Total	Endorser's Occupatior City, & State of Employ	and Name, /er
Date Loaned	Lender's Name and Address	PG RE IN	Amount of	Loan	Annual Interest Rate	Repayment Schedule	Date Due
						Lender's Occupation a Name, City & State of	
If mone	l tary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.	-					
Name and A	ddress of Each Loan Endorser, Co-Signer		mount Lial (Same as Amoun	Loan	Aggregate Total	Endorser's Occupatior City, & State of Employ	
Date Loaned	Lender's Name and Address	P G R E I N	Amount of	Loan	Annual Interest Rate	Repayment Schedule	Date Due
						Lender's Occupation a Name, City & State of	
If mone	 tary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.	->					p.oyo.
Name and A	ddress of Each Loan Endorser, Co-Signer		mount Lial (Same as Amoun	Loan	Aggregate Total	Endorser's Occupatior City, & State of Employ	a and Name, ver
Date Loaned	Lender's Name and Address	P G R E I N	Amount of	Loan	Annual Interest Rate	Repayment Schedule	Date Due
						Lender's Occupation a Name, City & State of	
If mone	tary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.	-					
Name and A	ddress of Each Loan Endorser, Co-Signer		mount Lial (Same as Amoun	Loan	Aggregate Total	Endorser's Occupatior City, & State of Employ	

Exhibit 1 - 3 of 11 PDC Case 66161 Joshua Freed Report of Investigation 10 of 86 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 0LYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

PDC OFFICE USE 100957543

02-10-2020

C4

(3/97)

Candidate or Committee Name (Do not abbreviate. Include full name)

Freed For Governor				Cit.	
Mailing Address PO Box 2141				City Bothell, WA	
Zip + 4 98041	Office Sought (Can	didates)	Election Date 2020		ucus Committees: During
Report Period From (las	st C-4) To (e	end of period)	Final Report?	expenditure (i.e., an expense	e not considered a contribution)
Covered 01/01	L/20 01	1/31/20	Yes No X	supporting or opposing a stat	e or local candidate?
RECEIPTS				*See next page	Yes No
 Previous total cash and (if beginning a new cam) 					\$ \$691,150.69
2. Cash received (From line	e 2, Schedule A)			\$ \$95,201.00	
3. In kind contributions rec	eived (From line 1, Sched	lule B)		\$661.84	
4. Total cash and in kind co	ontributions received this	period (Line 2 plu	us 3)		\$95,862.84
5. Loan principal repaymer	nts made (From line 2, Sc	hedule L)		(\$500,000.00)	
6. Corrections (From line 1	or 3, Schedule C)		Show + or	(-) \$0.00	
7. Net adjustments this per	iod (Combine line 5 & 6).			Show + or (-)	(\$500,000.00)
8. Total cash and in kind co	ontributions during campa	ign (Combine lin	es 1, 4 & 7)		\$287,013.53
9. Total pledge payments of	lue (From line 2, Schedul	е В)	\$0.00		
EXPENDITURES					
10. Previous total cash and (If beginning a new cam	in kind expenditures (From paign or calendar year, se	m line 17, last C- ee instruction boo	4) oklet)		\$202,985.01
11. Total cash expenditures	(From line 4, Schedule A)		\$521,765.47	
12. In kind expenditures (go	ods & services) (From line	e 1, Schedule B)		\$661.84	
					\$522,427.31
14. Loan principal repaymer	nts made (From line 2, Sc	hedule L)		(\$500,000.00)	
15. Corrections (From line 2	or 3, Schedule C)		Show + or	(-) \$0.00	
16. Net adjustments this per	iod (Combine lines 14 & ²	15)		Show + or (-)	(\$500,000.00)
17. Total cash and in kind ex	xpenditures during campa	aign (Combine lin	nes 10, 13 and 16)		\$225,412.32
CANDIDATES ONLY Won Los	Name not t Unopposed on ballot		and (Line 8 minus line	17)	
Primary election		-		ance(s) plus your petty cash balance.]	40 .00
Treasurer's Daytime Telepho	ne No.:		,	,	\$0.00
		20. Balance (S	Surplus or deficit) (Line	218 minus line 19)	\$61,601.21
-		accompanying sch		is true and correct to the best of my	-
Candidate's Signature	Date		Treasurer's Signatu	re	Date
					02/10/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

(11/93

Candidate or Committee Name (Do not abbreviate. Use full name.)

					01/01/20	01/31/20
1. CASH RECEIPTS (0	Contributions) whic	h have been reported	on C3. List each dep	oosit made since last C4 r	eport was submitted.	
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.00	
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.00	
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached		
2. TOTAL CASH RECE	IPTS			Enter als	o on line 2 of C4	\$95,201.00

2. TOTAL CASH RECEIPTS

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 1) committee, identify the candidate or committee in the Description block;

2) 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 3) 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
- C Contributions (monetary, in-kind & transfers) I - Independent Expenditures

DEFINITIONS ON NEXT PAGE

- 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

3. EXPENDITURES

- a) 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.
- b) 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 c) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	т	Travel Expense	\$313.36
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91

Total from attached pages \$ \$519,511.32

2 Report Date

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 3 Report Date

01/01/20 01/31/20

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58

Page Total \$ \$8,480.60

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

		R

Report Date

Page 4

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141		Loan Received	\$500,000.00
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00

Page Total \$\$511,030.72

Attachment to Schedule A Additional Deposits

for the period: 01/01/20 01/31/20

Name

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/21/20	\$730.00				
01/22/20	\$350.00				
01/23/20	\$4,135.00				
01/24/20	\$360.00				
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
01/31/20	\$50,000.00				
				Exhibit 1 - 8 o	f 11
				PDC Case 66161 Joshua F	

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4



(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date 01/01/20 01/31/20

6

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x		
	1	TOTAL THIS PAGE	\$661.84		<u> </u>		

LOANS	SCHEDULE TO C4			
		(12/99)	Page <u>7</u>	
Candidate or Committee Name			Report	Date
			01/01/20	01/31/20

2. LOAN PAYMENTS. Candidates may be repaid no more than amount loaned or permitted by WAC 390-05-400, whichever is less. See instruction manual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
)1/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	\$500,000.00	\$0.00	\$500,000.00	\$0.00
	Total Principal Paid This Page	\$500,000,00			
		4000,00000	ents This Page 🔶	\$500,000.00	

PDC Case 66161 Joshua Freed Report of Investigation 17 of 86

LOANS	SCHEDULE TO C4	(12/99)	8	
Candidate or Committee Name			Rep	oort Date
			01/01/20	01/31/20

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount \$500,000.00	Principal Repaid or Forgiven	Amount Owed
	Joshua Freed	\$500,000.00		
9/14/19	PO Box 2141		\$500,000.00	
	Bothell, WA 98041-2141			\$0.00
				Ş0.00
			Subtotal This Page	.
			Page	\$0.00

Exhibit 1 - 11 of 11

PDC Case 66161 Joshua Freed Report of Investigation 18 of 86

Exhibit 2

Complaint Description

Lorie Walker (Sat, 22 Feb 2020 at 2:00 PM)

This was also reported in the Seattle Times. <u>https://www.seattletimes.com/seattle-</u>

news/politics/gop-gubernatorial-candidate-joshua-freed-goes-back-and-forth-on-500kcampaign-

<u>loan/?utm_medium=social&utm_campaign=owned_echobox_f&utm_source=Facebook#Echobox=1581699272</u>

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

The loan Mr. Freed made to his campaign enabled him to gain support by the Washington State Republican Caucus, before other candidates could. While loans are permitted, loan repayments of over \$6,000 are not allowed per RCW. His loan of \$500,000 and subsequent repayment nearly four months later game him a significant advantage over other candidates.

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

http://web.pdc.wa.gov/rptimg/default.aspx?repno=100957543

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.

Exhibit 2 - 1 of 1

Exhibit 3

1970 Trosper Road SW, #P101 \$101.00 Tumwater, WA 98512 Tumwater, WA OccupationRETIRED x	PUBLIC	DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828	MON	H RECE NETARY ITRIBUT	_		(1/02)	3	ACE FOR OFFICE USE 0936492 9-10-2019
Mailing Address Pogt Office Box 2141 Comparison of the second state of the second sta	Candidate	or Committee Name (Do not abbreviate	. Use full nar	ne.)					
Post Office Box 2141 Clip Zip +4 Offics Sought (candidates) Election Date Bothell, WA 98041 Offics Sought (candidates) Election Date 2020 1.MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT Date Amount Total Betchell, WA 98041 Amount Total Date Amount Total Betchell Amount Total Date Contributions S25.00 or less not limited and number of persons giving	(Freed	for Governor)							
City Zp + 4 Office Sought (candidate) Election Date Bothall, WA 98041 GOVERNOR 2020 1.MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT Amount Total Date Amount Total Received a.Anonymous	•								
Bothell, WA 98041 GOVERNOR 2020 1.MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT Date Amount Total Received a.Anorymous		ffice Box 2141						51	
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Received a. Anonymous a. Anonymous b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) b. Candidate's personal funds deposited in the bank (include candidate loans in 1c) c. Dans, notes, security agreements. Attach Schedule L \$500,000.00 d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	T. MONET	I CONTRIBUTIONS DEFOSITED IN	ACCOUNT						
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09/14/19 c. Loans, notes, security agreements. Attach Schedule L		a. Anonymous							
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		b. Candidate's personal funds depo	osited in the b	ank (include car	ndidate loans in 1c)				
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I certify that this report is true and complete to the best of my knowledge 09/14/19 Treasurer's Signature Date Jeff Davis 10-10-2019		FUNDS RECEIVED AND DEPOSITED				eo pa	ges	\$508,101.00	
09/14/19 Jeff Davis 10-10-2019 Treasurer's Daytime Telephone No.: (206)617-9762 10-10-2019			, 200		I certify that this report is	true ar	nd co	mplete to the best of m	y knowledge
Jeff Davis 10-10-2019 Treasurer's Daytime Telephone No.: (206)617-9762	09/	/14/19		Γ	Treasurer's Signature				Date
			- 0		Jeff Davis			1	10-10-2019
	Treasurer	s Daytime Telephone No.: (206)61	1-9762					Evhibit	3 - 1 of 2

LOANS	5		SCHE TO C: OR C		Page 2	
Candidate	or Committee Name			(12)00)	Report Dat	ie
(Freed fo: 1 MONET	r Governor) ARY OR IN-KIND LOAN RECEIVED. Loans are (considered contribu	itions and ar	a subject to any applic	able limit	
Date Loaned D9/14/19	Lender's Name and Address JOSHUA FREED	P G Amoun R E	t of Loan	Annual Interest Rate 0%	Repayment Schedule	Date Due
	Post Office Box 2141 Bothell, WA 98041				Lender's Occupation a Name, City & State of	
If mone	 etary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B.					1 - 7 -
Name and A	ddress of Each Loan Endorser, Co-Signer	R E (Same	Liable For as Loan ount)	Aggregate Total	Endorser's Occupatior City, & State of Emplo	n and Name, yer
Date Loaned	Lender's Name and Address	P G Amoun R E I N	t of Loan	Annual Interest Rate	Repayment Schedule	Date Due
lf mon	etary loan, also include this amount on line 1c, C3 report.				Lender's Occupation a Name, City & State of	
	ddress of Each Loan Endorser, Co-Signer	P G Amount R E (Same	Liable For as Loan ount)	Aggregate Total	Endorser's Occupatior City, & State of Emplo	
Date Loaned	Lender's Name and Address	PGAmoun RE IN	t of Loan	Annual Interest Rate	Repayment Schedule	Date Due
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Name and A	ddress of Each Loan Endorser, Co-Signer	P G Amount R E (Same	Liable For as Loan ount)	Aggregate Total	Endorser's Occupatior City, & State of Emplo	n and Name, yer
Date Loaned	Lender's Name and Address	P G Amoun R E I N	t of Loan	Annual Interest Rate	Repayment Schedule	Date Due
					Lender's Occupation a Name, City & State of	
	etary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. ddress of Each Loan Endorser, Co-Signer	P G R E I N (Same	Liable For as Loan ount)	Aggregate Total	Endorser's Occupatior City, & State of Emplo	

Exhibit 3 - 2 of 2 PDC Case 66161 Joshua Freed Report of Investigation 23 of 86

Exhibit 4

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 0LYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

PDC OFFICE USE 100957543

02-10-2020

C4

(3/97)

Candidate or Committee Name (Do not abbreviate. Include full name)

Freed For Govern Mailing Address	nor			City	
PO Box 2141	0#:			Bothell, WA	
Zip + 4 98041	Office	Sought (Candidates)	Election Date 2020		ucus Committees: During nmittee make an <u>independent</u>
	om (last C-4)	To (end of period	I) Final Report?		e not considered a contribution)
Covered 0	1/01/20	01/31/20	Yes No X	supporting or opposing a stat	e or local candidate?
RECEIPTS				*See next page	Yes No
 Previous total cash (if beginning a new 	h and in kind contril v campaign or caler	outions (From line 8, last ndar year, see instructior	: C-4) h booklet)		\$\$691,150.69
2. Cash received (Fr	om line 2, Schedule	e A)		<u>\$</u> \$95,201.00	
3. In kind contribution	ns received (From li	ne 1, Schedule B)		\$661.84	
4. Total cash and in	kind contributions re	eceived this period (Line	2 plus 3)		\$95,862.84
5. Loan principal rep	ayments made (Fro	m line 2, Schedule L)		(\$500,000.00)	
6. Corrections (From	line 1 or 3, Schedu	le C)	Show + o	r (-) \$0.00	
7. Net adjustments the	nis period (Combine	e line 5 & 6)		Show + or (-)	(\$500,000.00)
8. Total cash and in	kind contributions d	uring campaign (Combir	ne lines 1, 4 & 7)	7	\$287,013.53
9. Total pledge paym	nents due (From line	e 2, Schedule B)	\$0.00		
EXPENDITURES					
10. Previous total cas (If beginning a new	h and in kind expen w campaign or calei	ditures (From line 17, las ndar year, see instruction	st C-4) n booklet)		\$202,985.01
11. Total cash expend	litures (From line 4,	Schedule A)		\$521,765.47	
12. In kind expenditure	es (goods & service	s) (From line 1, Schedul	le B)		
					<i>QJZZ/12/</i> •JI
14. Loan principal rep	ayments made (Fro	m line 2, Schedule L)		(\$500,000.00)	
15. Corrections (From	line 2 or 3, Schedu	le C)	Show + o	r (-) \$0.00	
16. Net adjustments th	nis period (Combine	e lines 14 & 15)		Show + or (-)	(\$500,000.00)
17. Total cash and in	kind expenditures d	uring campaign (Combir	ne lines 10, 13 and 16)		\$225,412.32
CANDIDATES ONLY Won	Lost Unoppose	Name not CASH SU		e 17)	
Primary election		[Line 18 s	should equal your bank account ba	alance(s) plus your petty cash balance.]	
General election		19. Liabili	ties: (Sum of loans and d	ebts owed)	\$0.00
Treasurer's Daytime Te	elephone NO.:	20. Balan	ce (Surplus or deficit) (Lin	e 18 minus line 19)	\$61,601.21
CERTIFICATION: certif	fy that the information	herein and on accompanyir	ng schedules and attachment	s is true and correct to the best of my	knowledge.
Candidate's Signature		Date	Treasurer's Signat		Date
					02/10/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

(11/93

Candidate or Committee Name (Do not abbreviate. Use full name.)

					01/01/20	01/31/20		
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		
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.00			
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.00			
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached				
2. TOTAL CASH RECE	IPTS			Enter als	so on line 2 of C4	\$95,201.00		

2. TOTAL CASH RECEIPTS

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 1) committee, identify the candidate or committee in the Description block;

2) 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 3) 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
- C Contributions (monetary, in-kind & transfers) I - Independent Expenditures

DEFINITIONS ON NEXT PAGE

- 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

3. EXPENDITURES

- a) 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..
- b) 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 C) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	Т	Travel Expense	\$313.36
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ \$519,511.32

Enter also on line 11 of C4 \$ \$521,765.47

2 Report Date

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date 01/01/20 01/31/20

Page 3

			01/01/20	01/31/20
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58
		1		

Page Total \$ \$8,480.60

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Page Total \$\$511,030.72

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141		Loan Received	\$500,000.00
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00
			<u> </u>	

Page 4

Report Date

01/01/20 01/31/20 Attachment to Schedule A Additional Deposits

for the period: 01/01/20 01/31/20

Name

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/21/20	\$730.00				
01/22/20	\$350.00				
01/23/20	\$4,135.00				
01/24/20	\$360.00				
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
01/31/20	\$50,000.00				
		l		Exhibit 4 - 5	
				PDC Case 66161 Joshua I	Freed

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4



(11/93)

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date 01/01/20 01/31/20

6

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	R	G E N	If total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x		
	1	TOTAL THIS PAGE	\$661.84		<u>I</u>		

LOANS	SCHEDULE TO C4					
		(12/99)	Page 7			
Candidate or Committee Name			Report	Date		
			01/01/20	01/31/20		

2. LOAN PAYMENTS. Candidates may be repaid no more than amount loaned or permitted by WAC 390-05-400, whichever is less. See instruction manual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
)1/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	\$500,000.00	\$0.00	\$500,000.00	\$0.00
	Total Principal Paid This Page	\$500,000,00			
		4000,00000	ents This Page 🔶	\$500,000.00	

LOANS	SCHEDULE TO C4	(12/99)	8	
Candidate or Committee Name		Report Date		
			01/01/20	01/31/20

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount \$500,000.00	Principal Repaid or Forgiven	Amount Owed
09/14/19	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	\$500,000.00	\$500,000.00	
	Bothell, WA 98041-2141			\$0.00
			Subtotal This	
			Subtotal This Page	\$0.00

Exhibit 4 - 8 of 8

PDC Case 66161 Joshua Freed Report of Investigation 32 of 86

Exhibit 5

On Thu, 11 Jun at 11:25 AM , Mark Lamb <mark@northcreeklaw.com> wrote: Ms. Fiman,

As discussed at the pre-hearing, the campaign erroneously classified the initial contribution as a loan on September 14, 2019. In the ensuing months the campaign realized this characterization resulted in a large liability being shown to the public reviewing its finances on the PDC website. In reality the campaign was never in debt and in fact Mr. Freed was donating large sums of money to support his own campaign.

Because of this persistent misconception, the campaign cleared out the mischaracterized contribution on 1/31/2020. The same day Mr. Freed donated \$50,000 to his campaign and has subsequently contributed an additional \$155,500 for a total of **\$205,500**.

At the pre-hearing PDC staff articulated a concern that this correction and refiling would not technically adhere to the loan repayment limitations of the FCPA.

But in interpreting this requirement it is critical to understand the policy rationale behind the loan restriction. The provision was created to prevent candidates from loaning large sums of money that could be repaid through campaign contributions *after* or close to the election, thus depriving voters of timely and accurate information about who is supporting a candidate before they vote.

Neither of those harms are present in this case. Mr. Freed made a donation that was mischaracterized, he subsequently refunded it to himself eight months before the election. He has since has donated over \$200,000 to the campaign. No voter has been deprived of any information about the Freed campaign or who is supporting it – indeed voters actually have a more accurate view of the campaign's finances.

All campaign finance regulations are subject to "exacting scrutiny" under *Buckley v. Valeo*, 424 U.S. 1, 64-68, 96 S. Ct. 612, 46 L. Ed. 2d 659 (1976). The Buckley Court identified only three interests of sufficient "magnitude" which would permit a campaign finance regulations to survive exacting scrutiny; none of which are present in the instant case and only one of which is worth discussing. "First, disclosure provides the *electorate* with information" that assists *voters* in "plac[ing] each candidate in the political spectrum more precisely than is often possible solely on the basis of party labels and campaign speeches [and]. .. alert[ing] the *voter* to the interests to which a candidate is most likely to be responsive and thus facilitate predictions of future performance in office." [Emphasis added].

Here Mr. Freed is supporting himself - there is no information given to the voters about any "interests" in a contribution to himself. For these very reasons candidates are permitted to make unlimited contributions to their own campaigns under both existing Washington law and controlling precedent. There simply is no constitutionally valid reason for preventing a candidate for acting as he did.

As I indicated at the pre-hearing we are open to amending the reports further if staff believes this is required but otherwise believe that the campaign has acted in a manner to enhance transparency and provide voters with timely and accurate information.

Exhibit 5 - 1 of 2

Please feel free to contact me with any additional questions or concerns.

Thank you.

Best,

Mark Lamb

The North Creek Law Firm A Professional Corporation

12900 NE 180th Street Suite #235 Bothell, WA 98011

(425) 368-4238 (425) 489-2824 (FAX)

www.northcreeklaw.com

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Exhibit 5 - 2 of 2

Exhibit 6

PUBLIC	DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828	MON	6H RECE NETARY ITRIBUT	-	((1/02)	3 10 AM 10	ACE FOR OFFICE USE 0979661 IENDS 0936492 - 30-2020
Candidate	e or Committee Name (Do not abbreviate.	. Use full nar	ne.)					
	for Governor)							
Mailing Ac								
	office Box 2141			011 0 11		<u>,</u>	Election Do	h
City		Zip + 4		Office Sought (can GOVERNOR	didates	5)	Election Dat	le
Bothel	LI, WA TARY CONTRIBUTIONS DEPOSITED IN	98041					2020	
Date Received		TACCOUNT					Amount	Total
	a. Anonymous							
	 b. Candidate's personal funds depo c. Loans, notes, security agreement d. Miscellaneous receipts (interest, 	ts. Attach Sc	hedule L	, 				
	e. Small contributions \$25.00 or les	s not itemized	d and number o	of persons giving (perso	າຣ)		
2. CONTR Date Received	RIBUTIONS OVER \$25.00	, State, Zip		ons of more than \$100:* 's Name, City and State	P R I	G E N	Amount	Aggregate [*] Total
09/14/19	ALLEN HAYWARD 1970 Trosper Road SW, # Tumwater, WA 98512	₽101	Retired Tumwater	, WA	х		\$101.00	\$101.00
			OccupationR	ETIRED				
09/14/19	KEVIN TAYLOR 15 Lake Bellevue Drive,	#102		evelopment	X		\$2,000.00	\$2,000.00
	Bellevue, WA 98005		Bellevue	vue, WA				
09/14/19	KEVIN TAYLOR 15 Lake Bellevue Drive, Bellevue, WA 98005	#102	Taylor D Bellevue	evelopment		x	\$2,000.00	\$2,000.00
	Bellevue, WA 98005			Occupation PRESIDENT				
09/14/19	ANGELA TAYLOR 15 Lake Bellevue Drive,	#102	Homemake		x		\$2,000.00	\$2,000.00
	Bellevue, WA 98005		Bellevue Occupation ^H	, WA IOMEMAKER				
09/14/19	ANGELA TAYLOR 15 Lake Bellevue Drive, Bellevue, WA 98005	#102	Homemake Bellevue	, WA		x	\$2,000.00	\$2,000.00
			Occupation ^H	IOMEMAKER				
	Check here if additional pages are attached			Am	Sub-t ount f ned pa	rom	\$8,101.00 \$500,000.00	*See reverse
	FUNDS RECEIVED AND DEPOSITED Coarts 1 and 2 above. Enter this amount in			NT			\$508,101.00	for details.
4. Date of	Deposit			I certify that this report is	true a	nd co		· · · · ·
-	/14/19 's Daytime Telephone No.: (206)61'	7-9762		Treasurer's Signature Jeff Davis				Date 06-30-2020
riedSuier							Exhibit	6 - 1 of 2

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Candidate or Committee Name (Do not abbreviate. Use full name.) (Freed for Governor)

Page <u>2</u>

Deposit Date	
09/14/19	

				1	•	1
2. CONTRIBU	TIONS OVER \$25.00	1	Р	G		
		Contributions of more than \$100:*	R	Е		Aggregate
Date Received	Contributor's Name, Address, City, State, Zip	Employer's Name, City and State	1	Ν	Amount	Total*
09/14/19	JOSHUA FREED	Freed for Governor	х			
	Post Office Box 2141	Bothell, WA		ŝ	500,000.00	\$500,000.00
	Bothell, WA 98041	Occupation CANDIDATE				
		CANDIDATE				
					-	
		Occupation				
					-	
		Occupation				
					-	
		Occupation				
					-	
		Occupation				
		Occupation		r –		
					-	
		Occupation				
		Occupation				
			L	•	1	
		Occupation	_	1		
		Occupation				
		Occupation				
					-	
		Occupation				
	1				1	L

Page Total\$500,000.00

Exhibit 7

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES PDC OFFICE USE 100972108 AMENDS 100957543 06-01-2020

C4

(3/97)

 TOLL FREE 1-877-601-2828
 LAI

 Candidate or Committee Name (Do not abbreviate. Include full name)

(360) 753-1111

OLYMPIA WA 98504-0908

Joshua Freed (Freed F	or Governor)				
Mailing Address PO Box 2141				City Bothell, WA	
Zip + 4 98041	Office Sought (Cano GOVERNOR	didates)	Election Date 2020		ucus Committees: During nmittee make an <u>independent</u>
Report Period From (last C-4	1) To (ei	nd of period)	Final Report?		e not considered a contribution)
Covered 01/01/20	0 01	/31/20	Yes No X	supporting or opposing a stat	e or local candidate?
RECEIPTS				*See next page	Yes No
 Previous total cash and in kin (if beginning a new campaign 	nd contributions (From a or calendar year, se	n line 8, last C-4) e instruction bool	klet)		\$\$691,150.69
2. Cash received (From line 2, S	Schedule A)			\$ \$95,201.00	
3. In kind contributions received	l (From line 1, Schedu	ule B)		\$661.84	
4. Total cash and in kind contrib					\$95,862.84
5. Loan principal repayments m					
6. Corrections (From line 1 or 3,	, Schedule C)		Show + or	(-) \$0.00	
7. Net adjustments this period ((\$500,000.00)
8. Total cash and in kind contrib					\$287,013.53
9. Total pledge payments due (I	From line 2, Schedule	e B)	\$0.00		
EXPENDITURES					
10. Previous total cash and in kin (If beginning a new campaign	nd expenditures (Fron n or calendar year, se	n line 17, last C-4 e instruction bool	l) klet)		\$202,985.01
11. Total cash expenditures (From	m line 4, Schedule A)			\$521,765.47	
12. In kind expenditures (goods &	& services) (From line	1, Schedule B).		\$661.84	
13. Total cash and in kind expend					<i>QJZZ/12/</i> ,JI
14. Loan principal repayments m	ade (From line 2, Sch	nedule L)		(\$500,000.00)	
15. Corrections (From line 2 or 3,	, Schedule C)		Show + or	(-) \$0.00	
16. Net adjustments this period (Combine lines 14 & 1	5)		Show + or (-)	(\$500,000.00)
17. Total cash and in kind expend	ditures during campai	gn (Combine line	es 10, 13 and 16)		\$225,412.32
CANDIDATES ONLY Won Lost L	Name not Jnopposed on ballot		nd (Line 8 minus line	17) ance(s) plus your petty cash balance.]	\$61,601.21
Primary election			squal your barn account bar		
General election		19. Liabilities:	(Sum of loans and de	bts owed)	\$0.00
Treasurer's Daytime Telephone N	lo.:	20. Balance (S	urplus or deficit) (Line	18 minus line 19)	\$61,601.21
CERTIFICATION: I certify that the inf	formation herein and on	accompanying sch	edules and attachments	is true and correct to the best of my	knowledge.
Candidate's Signature	Date		Treasurer's Signatu		Date
Joshua Freed	06	/01/20	Jeff Davis		06/01/20

CASH RECEIPTS AND EXPENDITURE

Candidate or Committee Name (Do not abbreviate. Use full name.)

Joshua Freed (F	reed For Gov	vernor)			01/01/20	01/31/20
1. CASH RECEIPTS (eport was submitted					
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.00	
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.00	
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached		
2. TOTAL CASH RECE	\$ \$95,201.00					

2. TOTAL CASH RECEIPTS

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 1) committee, identify the candidate or committee in the Description block;

2) 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 3) 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
- C Contributions (monetary, in-kind & transfers) I - Independent Expenditures

DEFINITIONS ON NEXT PAGE

- 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

2

Report Date

- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) 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..
- b) 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 c) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / 600 Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	Т	Travel Expense	\$313.36
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91

Total from attached pages \$ \$519,511.32



Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 3 Report Date

01/31/20

01/01/20

Joshua Freed (Freed For Governor)

	sed (Freed For Governor)		01/01/20	01/51/20
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58

Page Total \$ \$8,480.60

Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 4 Report Date

Joshua Freed (Freed For Governor)

01/01/20 01/31/20

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141		Loan Received	\$500,000.00
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00

Page Total \$\$511,030.72

Attachment to Schedule A Additional Deposits

Name

Joshua Freed (Freed For Governor)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/20/20	\$730.00				
01/21/20					
	\$350.00				
01/23/20	\$4,135.00				
01/24/20	\$360.00				
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
01/31/20	\$50,000.00				
				 Exhibit 7 - 5	of 22
				PDC Case 66161 Joshua	
				Report of Investi	

5

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

(11/93)

6

Candidate or Committee Name (Do not abbreviate. Use full name.) Joshua Freed (Freed For Governor) Report Date 01/01/20 01/31/20

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	R	G E N	If total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x		
	1	TOTAL THIS PAGE	\$661.84		1		

LOANS	SCHEDULE TO C4			
		(12/99)	Page 7	
Candidate or Committee Name			Repor	Date
Joshua Freed (Freed For Governor)			01/01/20	01/31/20
2. LOAN PAYMENTS. Candidates may be repaid no more than amount loaned or permitted	by WAC 390-05-400, whic	hever is les	s. See instruction ma	nual.

Date Paid	Lender's Name and Address	Principal Paid	Interest Paid	Total Payment	Balance Owed
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	\$500,000.00	\$0.00		\$0.00
				\$500,000.00	
-					
					_
	Total Principal Paid This Page				
		→ \$500,000.00	anto Thio Dogo		
		Total Paym	nents This Page	\$500,000.00	

Exhibit 7 - 7 of 22

PDC Case 66161 Joshua Freed Report of Investigation 46 of 86

LOANS	SCHEDULE TO C4	(12/99)	8	
Candidate or Committee Name	Report Date			
Joshua Freed (Freed For Governor)	01/01/20	01/31/20		

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount \$500,000.00	Principal Repaid or Forgiven	Amount Owed
9/14/19	Joshua Freed PO Box 2141	\$500,000.00		
5, 11, 15	Bothell, WA 98041-2141		\$500,000.00	\$0.00
			Subtotal This Page	\$0.00

Exhibit 7 - 8 of 22

PDC Case 66161 Joshua Freed Report of Investigation 47 of 86 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES PDC OFFICE USE 100976192 AMENDS 100972108 06-12-2020

C4

(3/97)

 TOLL FREE 1-877-601-2828
 LAI

 Candidate or Committee Name (Do not abbreviate. Include full name)

(360) 753-1111

OLYMPIA WA 98504-0908

	For Governor)			01	
Mailing Address PO Box 2141				City Bothell, WA	
Zip + 4 98041	Office Sought (Cano GOVERNOR	didates)	Election Date 2020		ucus Committees: During nmittee make an independent
Report Period From (last C-	4) To (e	nd of period)	Final Report?		e not considered a contribution)
Covered 01/01/2	0 01	/31/20	Yes No X	supporting or opposing a stat	e or local candidate?
RECEIPTS				*See next page	Yes No
 Previous total cash and in kin (if beginning a new campaigner) 	nd contributions (Fron n or calendar year, se	n line 8, last C-4) e instruction boo) klet)		\$ \$691,150.69
2. Cash received (From line 2,	Schedule A)			\$ \$95,201.00	
3. In kind contributions received	d (From line 1, Sched	ule B)		\$661.84	
4. Total cash and in kind contri	butions received this p	period (Line 2 plu	us 3)		\$95,862.84
5. Loan principal repayments m	nade (From line 2, Sch	edule L)		(\$500,000.00)	
6. Corrections (From line 1 or 3	3, Schedule C)		Show + or	(-) \$0.00	
7. Net adjustments this period	(Combine line 5 & 6)			Show + or (-)	(\$500,000.00)
8. Total cash and in kind contri	butions during campai	gn (Combine line	es 1, 4 & 7)		\$287,013.53
9. Total pledge payments due (From line 2, Schedule	e B)	\$0.00		
EXPENDITURES					
10. Previous total cash and in ki (If beginning a new campaig	nd expenditures (Fron n or calendar year, se	n line 17, last C-4 e instruction boo	4) oklet)		\$204,807.53
11. Total cash expenditures (Fro	om line 4, Schedule A)				
12. In kind expenditures (goods	& services) (From line	1, Schedule B)		\$661.84	
13. Total cash and in kind exper					\$522,427.31
14. Loan principal repayments m	nade (From line 2, Sch	nedule L)		(\$500,000.00)	
15. Corrections (From line 2 or 3	3, Schedule C)		Show + or	(-) \$0.00	
16. Net adjustments this period	(Combine lines 14 & 1	5)		Show + or (-)	(\$500,000.00)
17. Total cash and in kind exper	ditures during campa	gn (Combine lin	es 10, 13 and 16)		\$227,234.84
CANDIDATES ONLY Won Lost	Name not Unopposed on ballot	CASH SUMM 18. Cash on ha		17)	\$59,778.69
Primary election				ance(s) plus your petty cash balance.]	
General election		19. Liabilities:	(Sum of loans and del	ots owed)	\$0.00
Treasurer's Daytime Telephone I	No.:				<u>\$0.00</u>
		20. Balance (S	Surplus or deficit) (Line	18 minus line 19)	\$59,778.69
CERTIFICATION: I certify that the in		accompanying sch		-	
Candidate's Signature	Date		Treasurer's Signatur	e	Date
Joshua Freed	06	/12/20	Jeff Davis		06/12/20

CASH RECEIPTS AND EXPENDITURE

Candidate or Committee Name (Do not abbreviate. Use full name.)

Joshua Freed (F	reed For Gov	vernor)			01/01/20	01/31/20			
1. CASH RECEIPTS (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			
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.00				
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.00				
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached					
2. TOTAL CASH RECE	o on line 2 of C4	\$ <u>\$95,201.00</u>							

2. TOTAL CASH RECEIPTS

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 1) committee, identify the candidate or committee in the Description block;

2) 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 3) 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
- C Contributions (monetary, in-kind & transfers) I - Independent Expenditures

DEFINITIONS ON NEXT PAGE

- 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

2

Report Date

- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) 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..
- b) 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 c) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / 600 Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	Т	Travel Expense	\$313.36
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ \$519,511.32



Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 3 Report Date

01/31/20

01/01/20

Joshua Freed (Freed For Governor)

	ca (meca for dovernor)		01/01/20	01/01/20
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58

Page Total \$ \$8,480.60

Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 4 Report Date

Joshua Freed (Freed For Governor)

01/01/20 01/31/20

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141		Loan Received	\$500,000.00
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00

Page Total \$\$511,030.72

Attachment to Schedule A Additional Deposits

Name

Joshua Freed (Freed For Governor)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/21/20	\$730.00				
01/22/20	\$350.00				
01/23/20	\$4,135.00				
01/24/20	\$360.00				
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
01/31/20	\$50,000.00				
		1		Exhibit 7 - 13	
				PDC Case 66161 Joshua Report of Investi	
				S2	gation 2 of 86

5

52 of 86

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

(11/93)

6

Candidate or Committee Name (Do not abbreviate. Use full name.) Joshua Freed (Freed For Governor) Report Date 01/01/20 01/31/20

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

						-	
Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	If total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x		
	I	TOTAL THIS PAG	^{3E} \$661.84		L		

LOANS	SCHEDULE TO C4					
		(12/99)	Page <u>7</u>			
Candidate or Committee Name				Report Date		
Joshua Freed (Freed For Governor)			01/01/20	01/31/20		
2. LOAN PAYMENTS. Candidates may be repaid no more than amount loaned or permitted	by WAC 390-05-400, whic	hever is les	s. See instruction ma	nual.		

Date Paid	Lender's Name and Address		Principal Paid	Interest Paid	Total Payment	Balance Owed
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141		\$500,000.00	\$0.00	\$500,000.00	\$0.00
	Total Principal Paid This Page	-	\$500,000.00			
			Total Paym	ents This Page 🔶	\$500,000.00	

PDC Case 66161 Joshua Freed Report of Investigation 54 of 86

LOANS	SCHEDULE TO C4	(12/99)	8	
Candidate or Committee Name	Report Date			
Joshua Freed (Freed For Governor)	01/01/20	01/31/20		

4. LOANS STILL OWED. List each loan that has previously been reported and still has a balance due.

Date	Lender's Name and Address	Original Amount \$500,000.00	Principal Repaid or Forgiven	Amount Owed
	Joshua Freed	\$500,000.00		
9/14/19	PO Box 2141		\$500,000.00	
	Bothell, WA 98041-2141			\$0.00
				-
			Subtotal This	
			Subtotal This Page	\$0.00

Exhibit 7 - 16 of 22

PDC Case 66161 Joshua Freed Report of Investigation 55 of 86 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES PDC OFFICE USE 100979676 AMENDS 100976192 06-30-2020

C4

(3/97)

TOLL FREE 1-877-601-2828

(360) 753-1111

OLYMPIA WA 98504-0908

Joshua Freed (Freed F Mailing Address	or Governor)			City	
PO Box 2141				Bothell, WA	
Zip + 4 98041	Office Sought (Cano GOVERNOR	didates)	Election Date 2020	*For PACs, Parties & Cau this report period, did the com	
Report Period From (last C-4	4) To (er	nd of period)	Final Report?	<u>expenditure</u> (i.e., an expense supporting or opposing a state	
Covered 01/01/20	0 01	/31/20	Yes No X	supporting or opposing a state	or local candidate?
RECEIPTS				*See next page	Yes No
 Previous total cash and in kin (if beginning a new campaign 	d contributions (From or calendar year, see	n line 8, last C-4) e instruction bool	klet)	<u>-</u>	\$\$691,150.69
2. Cash received (From line 2, S	Schedule A)			. \$ \$95,201.00	
3. In kind contributions received	(From line 1, Schedu	ıle B)			
4. Total cash and in kind contrib	outions received this p	period (Line 2 plu	ıs 3)		\$95,862.84
5. Loan principal repayments ma	ade (From line 2, Sch	edule 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 contrib	outions during campai	gn (Combine line	es 1, 4 & 7)		\$787.013.53
9. Total pledge payments due (F				-	
EXPENDITURES		,	Ş0.00		
10. Previous total cash and in kin (If beginning a new campaign	nd expenditures (From a or calendar year, se	n line 17, last C-4 e instruction boo	1) klet)		\$204,807.53
11. Total cash expenditures (Fror	m line 4, Schedule A)				
12. In kind expenditures (goods &	& services) (From line	1, Schedule B).			
13. Total cash and in kind expend	ditures made this peri	od (Line 11 plus	line 12)		\$522,427.31
14. Loan principal repayments ma	ade (From line 2, Sch	edule L)			
15. Corrections (From line 2 or 3,	Schedule C)		Show + or (-		
16. Net adjustments this period (·	
		,			\$0.00
17. Total cash and in kind expend			,		\$727,234.84
CANDIDATES ONLY Won Lost U	Name not Jnopposed on ballot		and (Line 8 minus line 1	7) ice(s) plus your petty cash balance.]	\$59,778.69
Primary election		19. Liabilities:	(Sum of loans and deb	ts owed)	\$0.00
Treasurer's Daytime Telephone N	lo.:			-	Ş0.00
-		20. Balance (S	urplus or deficit) (Line 1	18 minus line 19)	\$59,778.69
CERTIFICATION: I certify that the inf		accompanying sch			
Candidate's Signature	Date		Treasurer's Signature)	Date
Joshua Freed	06	/30/20	Jeff Davis		06/30/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

					(11/93)		-
Candidate or Committee	Name (Do not ab	breviate. Use full nam	e.)			Rep	port Date
Joshua Freed (Fr	ceed For Gov	vernor)			01/01	/20	01/31/20
1. CASH RECEIPTS (C	Contributions) whic	h have been reported	on C3. List each dep	oosit made since last C4 r	eport was sub	mitted.	
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amou	unt	Total deposits
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.0	00	
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.0	00	
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached			
2. TOTAL CASH RECE	IPTS			Enter als	so on line 2 of	C4 \$	\$95,201.00

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 1) committee, identify the candidate or committee in the Description block;

2) 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 3) 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

2

- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) 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.
- b) 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 c) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / 600 Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	т	Travel Expense	\$313.36
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	G	Refund of Contribution	\$500,000.00
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ \$19,565.23

Enter also on line 11 of C4 \$ \$521,765.47

Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 3 Report Date

01/31/20

01/01/20

Joshua Freed (Freed For Governor)

	eed (Freed For Governor)		01/01/20	01/31/20
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00

Page Total \$ \$7,307.93

Candidate or Committee Name (Do not abbreviate. Use full name.)

Joshua Freed (Freed For Governor)

Page 4 Report Date

01/01/20 01/31/20

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00

Page Total \$ \$12,257.30

Attachment to Schedule A Additional Deposits

Name

Joshua Freed (Freed For Governor)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/21/20	\$730.00				
01/22/20	\$350.00				
01/23/20	\$4,135.00				
01/24/20	\$360.00				
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
01/31/20	\$50,000.00				
					(00
				Exhibit 7 - 21 PDC Case 66161 Joshua	
				Report of Investig	

5

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

(11/93)

6

Candidate or Committee Name (Do not abbreviate. Use full name.) Joshua Freed (Freed For Governor) Report Date 01/01/20 01/31/20

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	P R I	G E N	lf total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x		
	1	TOTAL THIS PAGE	\$661.84		I		

Exhibit 8

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES PDC OFFICE USE 100985344 AMENDS 100979676 07-21-2020

C4

(3/97)

TOLL FREE 1-877-601-2828

OLYMPIA WA 98504-0908 (360) 753-1111

•	'or Governor)							
Mailing Address PO Box 2141					City Bothel	.1, WA		
Zip + 4 98041	Office Sought (Candid GOVERNOR	ates)	Election E 2020	ate				nmittees: During ke an independent
Report Period From (last C-4	4) To (end	of period)	Final Rep	ort?	<u>expenditu</u>	ire (i.e., an expens	e not consid	dered a contribution)
Covered 01/01/20	0 01/3	31/20	Yes No	х	supporting	or opposing a sta	te or local c	andidate?
RECEIPTS					*See next	page	Yes	No
 Previous total cash and in kir (if beginning a new campaign 							\$	\$691,150.69
2. Cash received (From line 2, S	Schedule A)				\$	\$45,201.00	-	
3. In kind contributions received	I (From line 1, Schedule	В)				\$661.84	_	
4. Total cash and in kind contrib	outions received this per	iod (Line 2 plu	ıs 3)					\$45,862.84
5. Loan principal repayments m	ade (From line 2, Scheo	dule L)				\$0.00	_	
6. Corrections (From line 1 or 3)	, Schedule C)		Shc	w + or (-)	\$0.00	_	
7. Net adjustments this period (Combine line 5 & 6)					Show + or (-)		\$0.00
8. Total cash and in kind contrib	outions during campaign	(Combine line	es 1, 4 & 7)					\$737,013.53
9. Total pledge payments due (l	From line 2, Schedule B)	\$0	.00				
EXPENDITURES								
10. Previous total cash and in kir (If beginning a new campaigr	nd expenditures (From li n or calendar year, see i	ne 17, last C-4 nstruction boo	1) klet)					\$204,807.53
11. Total cash expenditures (From	m line 4, Schedule A)					\$471,765.47	7	
12. In kind expenditures (goods &	& services) (From line 1,	Schedule B)				\$661.84	Ł	
13. Total cash and in kind expend	ditures made this period	l (Line 11 plus	line 12)					\$472,427.31
14. Loan principal repayments m	ade (From line 2, Schec	lule L)				\$0.00	<u>)</u>	
15. Corrections (From line 2 or 3)	, Schedule C)		Shc	w + or (-)	\$0.00)	
16. Net adjustments this period (Combine lines 14 & 15)					Show + or (-)		\$0.00
17. Total cash and in kind expendent	ditures during campaign	(Combine line	es 10, 13 and ⁻	6)				\$677,234.84
CANDIDATES ONLY Won Lost U					17)			
	Jnopposed on ballot 1					r petty cash balance.]		\$59,778.69
Primary election		9. Liabilities:	(Sum of loans	and deb	ots owed)			\$0.00
Treasurer's Daytime Telephone N			under an de Car	0.4.5.	10	(10)		#0100
		LU. Balance (S	urplus or defici	i) (Line	ið minus lir	ie 19)		\$59,778.69
CERTIFICATION: I certify that the int		companying sch				rrect to the best of my	y knowledge.	
Candidate's Signature	Date		Treasurer's S	Signature	9			Date
Joshua Freed	07/2	21/20	Jeff Dav	is				07/21/20

CASH RECEIPTS AND EXPENDITURE

Candidate or Committee	e Name (Do not ab	breviate. Use full nam	e.)		R	eport Date
Joshua Freed (F	reed For Go	vernor)			01/01/20	01/31/20
1. CASH RECEIPTS (Contributions) whic	h have been reported	on C3. List each dep	oosit made since last C4 re	eport was submitted	
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
01/01/2020	\$224.00	01/04/2020	\$100.00	01/07/2020	\$25.00	
01/02/2020	\$125.00	01/05/2020	\$25.00	01/08/2020	\$450.00	
01/03/2020	\$275.00	01/06/2020	\$2,585.00	See attached		
2. TOTAL CASH RECE	EIPTS			Enter als	o on line 2 of C4	\$ <u>\$45,201.0</u> 0

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 <u>in-kind or earmarked contributions</u> to a candidate or committee or <u>independent expenditures</u> that benefit a candidate or committee, identify the candidate or committee in the Description block;

2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and

3) 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

2

- W Wages, Salaries, Benefits
- G General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of <u>\$50 or less</u>, 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.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) 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	\$234.39
01/23/20	Moo.com 14 Blackstone Valley Pl Lincoln, RI 02865-1145	L	Printing / 600 Business Cards	\$406.69
01/02/20	Hotels.com Sales 5400 LBJ Fwy Ste 500 Dallas, TX 75240-1019	F	Hotel Expense	\$118.96
01/17/20	Snohomish C GOP 3115 Oakes Ave Everett, WA 98201-4405	G	Event Tickets	\$500.00
01/14/20	Orbitz Sales 500 W Madison St Chicago, IL 60661-4544	т	Travel Expense	\$313.36
01/31/20	Joshua Freed PO Box 2141 Bothell, WA 98041-2141	G	Refund of Contribution	\$450,000.00
01/17/20	CG Catering 9221 W Clearwater Ave Kennewick, WA 99336-8587	F	Event Expense	\$626.84

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ \$19,565.23

Enter also on line 11 of C4 \$ \$471,765.47



Candidate or Committee Name (Do not abbreviate. Use full name.)

Page 3 Report Date

01/31/20

01/01/20

Joshua Freed (Freed For Governor)

	664 (11664 161 66761m61)		01, 01, 20	01/01/20
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/27/20	Party City - Woodinville 18027 Garden Way NE Woodinville, WA 98072-3572	G	Event Supplies	\$53.91
01/24/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$1,750.00
01/21/20	Shell Newcastle 6420 Lake Washington Blvd SE Newcastle, WA 98056-1014	т	Travel / Fuel	\$86.15
01/09/20	Chevron 18725 Bothell Way NE Bothell, WA 98011-1930	т	Travel/Fuel	\$60.00
01/21/20	Schwartz Brothers Bellevue 325 118th Ave SE Bellevue, WA 98005-3539	G	Meeting Expense	\$125.00
01/27/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$158.40
01/13/20	Costco Corp. 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$52.28
01/17/20	The Davenport Grand 333 W Spokane Falls Blvd Spokane, WA 99201-0211	т	Travel Expense	\$386.21
01/31/20	Costco Gass - Lynnwood 18109 33rd Ave W Lynnwood, WA 98037-4840	т	Travel / Fuel	\$54.91
01/06/20	Shell Service 15606 NE Woodinville Duvall Pl Woodinville, WA 98072-5226	т	Travel/Fuel	\$81.07
01/09/20	Blake Zeman 3202 W Concord Way Apt 465 Mercer Island, WA 98040-6232	м	Consulting Services	\$1,875.00
01/08/20	Azra Hadzic 4216 Woodland Park Ave N Seattle, WA 98103-7447	м	Consulting Services	\$2,625.00
		1		

Page Total \$ \$7,307.93

Candidate or Committee Name (Do not abbreviate. Use full name.)

Joshua Freed (Freed For Governor)

Page 4 Report Date

01/01/20 01/31/20

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
01/31/20	Anedot 450 Laurel Street, Suite 2105 Baton Rouge, LA 70801-1821	G	Credit Card Processing Fees	\$1,226.58
01/15/20	Hyatt R Bellevue 900 Bellevue Way NE Bellevue, WA 98004-4206	F	Event Expense	\$2,000.00
01/10/20	Squarespace Sales 311 SW Washington St Portland, OR 97204-2612	G	Site Operations	\$99.20
01/27/20	Randy's Gasoline 24100 WA-3 Belfair, WA 98528	т	Travel / Fuel	\$88.83
01/24/20	Irene Thai Cuisine 17530 132nd Ave NE Woodinville, WA 98072-8500	G	Meeting Expense	\$61.95
01/17/20	AZ Consulting, LLC 2606 Mayfair Ave N Seattle, WA 98109-1850	м	Consulting	\$4,000.00
01/27/20	Shilo Inn 707 Ocean Shores Blvd Ocean Shores, WA 00000	т	Hotel Expense	\$672.00
01/13/20	Ascend P Steak 10400 NE 4th St Ste 3100 Bellevue, WA 98004-5267	F	Event Expense	\$608.74
01/13/20	JENNIFER HICKS 14204 128th Pl NE Kirkland, WA 98034-1575	м	Consulting	\$3,500.00

Page Total \$ \$12,257.30

Attachment to Schedule A Additional Deposits

Name

Joshua Freed (Freed For Governor)

Date of Deposit	Amount	Date of Deposit	Amount	Date of Deposit	Amount
01/09/20	\$1,515.00				
01/10/20	\$425.00				
01/11/20	\$2,975.00				
01/13/20	\$990.00				
01/14/20	\$1,075.00				
01/15/20	\$350.00				
01/16/20	\$9,010.00				
01/17/20	\$75.00				
01/20/20	\$25.00				
01/21/20	\$730.00				
01/22/20	\$350.00				
01/23/20	\$4,135.00				
	\$360.00				
01/24/20					
01/25/20	\$25.00				
01/26/20	\$305.00				
01/27/20	\$675.00				
01/28/20	\$2,012.00				
01/29/20	\$1,025.00				
01/30/20	\$725.00				
01/31/20	\$14,610.00				
	l			 Exhibit 8 -	5 of 6
				PDC Case 66161 Joshua	
				Report of Invest	

5

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4

(11/93)

6

Candidate or Committee Name (Do not abbreviate. Use full name.) Joshua Freed (Freed For Governor) Report Date 01/01/20 01/31/20

1. IN KIND CONTRIBUTIONS RECEIVED (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution	Fair Market Value	Aggregate Total	R	G E N	lf total over \$100, Employer Name, City, State & Occup
01/19/20	Rankin E Co. 3205 Bay St Union Gap, WA 98903-1881	Hotel Rooms	\$661.84	\$661.84	x	N	State & Occup
	1	TOTAL THIS PAG	E \$661.84		<u> </u>		

Exhibit 9



10 South First Avenue P.O. Box 907 Walla Walla, WA 99362-0265 bannerbank.com

Freed for Governor PO Box 2141 Bothell W A 98041

Statement of Account



(509) 527-3636 I (800) 272-9933 Toll-Free



SUMMARY OF ACCOUNTS

Basic Business Checking

\$491,029.31

Refer-a-Friend and get \$25 for you and \$25 for your friend! Each time someone you refer opens a Banner Connected Checking account, we'll deposit \$25 in your account and \$25 in theirs. Ask us how to get started. Offer ends Dec. 6, 2019.

CHECKING ACCOUNT

Basic Business Checking

Account Title: Freed for Governor Account Number Previous Balance Deposits/Credits Checks Service Charge Interest Paid Current Balance



XXXXXXXXXXXX1216

Statement Dates Days in the statement period Average Ledger Average Collected 9/03/19 thru 9/30/19

XXXXXXXXXXXXX1216



OVERDRAFT/RETURN ITEM FEESTotal For
This PeriodTotal
Year-To-DateTotal Overdraft FeesImage: Comparison of the set of t

IMPORTANT INFORMATION YOU SHOULD KNOW		UR STATEMENT AND F PURPOSES UNLESS Y	EPORT ANY IRREGULARITIES TO US. THIS STATEMENT WILL BE CONSIDERED DU NOTIFY US.
BALANCING YOUR ACCOUNT	INCLUDING CHECK	OT CHARGED TO ACCOUNT (S, ATM WITHDRAWALS ITOMATIC DEDUCTIONS	
	NO. (if any) AMOUNT		
			BANK BALANCE SHOWN ON THIS STATEMENT \$
			ADD
			DEPOSITS NOT SHOWNNTHIS STATEMENT (IF ANY) \$
			_
			-
			\$
			SUBTRACT
			TOTAL ITEMS OUTSTANDING \$
			BALANCE \$
			SHOULD AGREE WITH YOUR CHECK BOOK BALANCE AFTER DEDUCTING SERVICE CHARGES (IF ANY) SHOWN ON THIS STATEMENT.
	TOTAL	\$	

IMPORTANT DISCLOSURES

CONTACT US	BANNER BANK PO BOX 907 Walla Walla, WA 99362 Toll Free: 1-800-272-9933 or 24 Hour Banner Bank by Phone: 1-800-527-6435
ACCOUNT STATEMENTS	If you find an error in your statement, or if you need more information about a transaction, please contact us at the address listed above. The Bank will not be liable for any check that is altered or any signature that is forged unless you notify us within thirty (30) calendar days after the statement and the altered or forged item(s) are made available. For any other error(s), you must also report this within this thirty (30) day period. When writing to us, please provide the information requested below.
ELECTRONIC TRANSFERS	In case of errors or questions about your electronic transfers, call us or write us at the address listed above as soon as you can if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.
	 Tell us your name and account number (if any). Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information. Tell us the dollar amount of the suspected error.
	We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.
CREDIT LINES	Information about your loan and/or credit line accounts are provided for informational purposes only. Please refer to your loan statement or loan agreement for further information.



Exhibit 9 - 2 of 8 PDC Case 66161 Joshua Freed Report of Investigation 71 of 86



10 South First Avenue P.O. Box 907 Walla Walla, WA 99362-0265 bannerbank.com

Statement Date	
Page	
Account Number	
(509) 527-3636	I (800) 272-9933 Toll-Free

Deposits and Additions



Withdrawals and Deductions

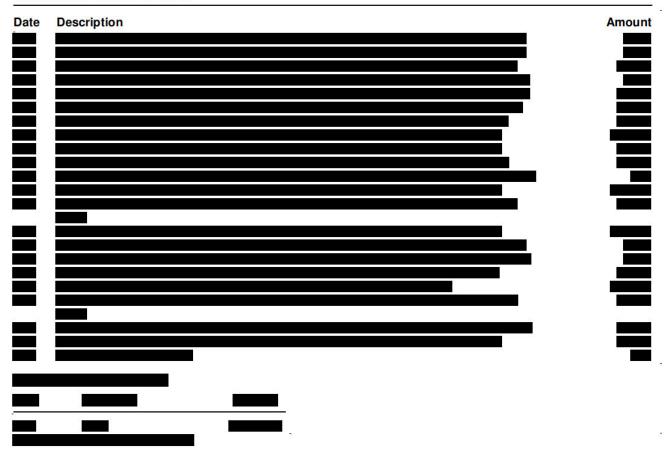


Exhibit 9 - 3 of 8 PDC Case 66161 Joshua Freed Report of Investigation 72 of 86



Statement of Account



(509) 527-3636 I (800) 272-9933 Toll-Free

Daily Balance Summary

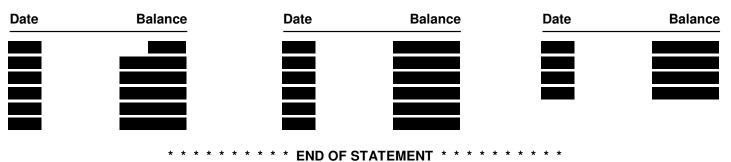


Exhibit 9 - 4 of 8



10 South First Avenue P.O. Box 907 Walla Walla, WA 99362-0265 bannerbank.com Statement of Account

Statement Date	12/31/19
Page	1 of 3
Account Number	

Freed for Governor PO Box 2141 Bothell WA 98041 (509) 527-3636 I (800) 272-9933 Toll-Free



SUMMARY OF ACCOUNTS

Basic Business Checking

Here's one for the life-just-got-easier category: If you have Online Banking, you can download your transactions to Quicken & QuickBooks - no charge. No kidding! Direct Connect simplifies categorization, reconciliation and more. Ask us!

CHECKING ACCOUNT

Basic Business Checking

Account Title: Freed for Governor Account Number Previous Balance Deposits/Credits Checks Service Charge Interest Paid Current Balance



Statement Dates Days in the statement period Average Ledger Average Collected 12/02/19 thru 12/31/19

XXXXXXXXXXXXX1216



OVERDRAFT/RETURN ITEM FEES	Total For This Period	Total Year-To-Date
Total Overdraft Fees		
Total Returned Item Fees		

IMPORTANT INFORMATION YOU SHOULD KNOW		DUR STATEMENT AND PURPOSES UNLESS \	REPORT ANY IRREGULARITIES TO US. THIS STATEMENT WILL BE CONSIDE OU NOTIFY US.	
BALANCING YOUR ACCOUNT	INCLUDING CHECH	IOT CHARGED TO ACCOUNT KS, ATM WITHDRAWALS JTOMATIC DEDUCTIONS	-	
	NO. (if any) AMOUNT			
			BANK BALANCE SHOWN ON THIS STATEMENT \$	
			ADD	
			DEPOSITS NOT SHOWN IN THIS STATEMENT (IF ANY) \$	
			TOTAL \$	
			SUBTRACT	
			TOTAL ITEMS OUTSTANDING \$	
			BALANCE §	
			BALANCE \$	
			SHOULD AGREE WITH YOUR CHECK BOOK BALANCE AFTER DEDUCTING SERVICE CHARGES (IF ANY) SHOWN ON THIS STATEMENT.	
	TOTAL	\$		

IMPORTANT DISCLOSURES

CONTACT US	BANNER BANK PO BOX 907 Walla Walla, WA 99362 Toll Free: 1-800-272-9933 or 24 Hour Banner Bank by Phone: 1-800-527-6435
ACCOUNT STATEMENTS	If you find an error in your statement, or if you need more information about a transaction, please contact us at the address listed above. The Bank will not be liable for any check that is altered or any signature that is forged unless you notify us within thirty (30) calendar days after the statement and the altered or forged item(s) are made available. For any other error(s), you must also report this within this thirty (30) day period. When writing to us, please provide the information requested below.
ELECTRONIC TRANSFERS	In case of errors or questions about your electronic transfers, call us or write us at the address listed above as soon as you can if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.
	 Tell us your name and account number (if any). Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information. Tell us the dollar amount of the suspected error.
	We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.
CREDIT LINES	Information about your loan and/or credit line accounts are provided for informational purposes only. Please refer to your loan statement or loan agreement for further information.



Exhibit 9 - 6 of 8 PDC Case 66161 Joshua Freed Report of Investigation 75 of 86



10 South First Avenue P.O. Box 907 Walla Walla, WA 99362-0265 bannerbank.com

Statement of Account

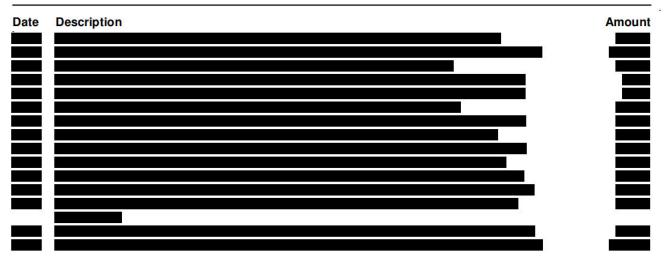
12/31/19
2 of 3
10

(509) 527-3636 I (800) 272-9933 Toll-Free

Service Charge Breakdown

Date 12/31	Description Item Fee in Service Charge	Amount
Depo	sits and Additions	
Date	Description	Amount
		_

Withdrawals and Deductions





10 South First Avenue P.O. Box 907 Walla Walla, WA 99362-0265 bannerbank.com

Statement of Account



(509) 527-3636 I (800) 272-9933 Toll-Free

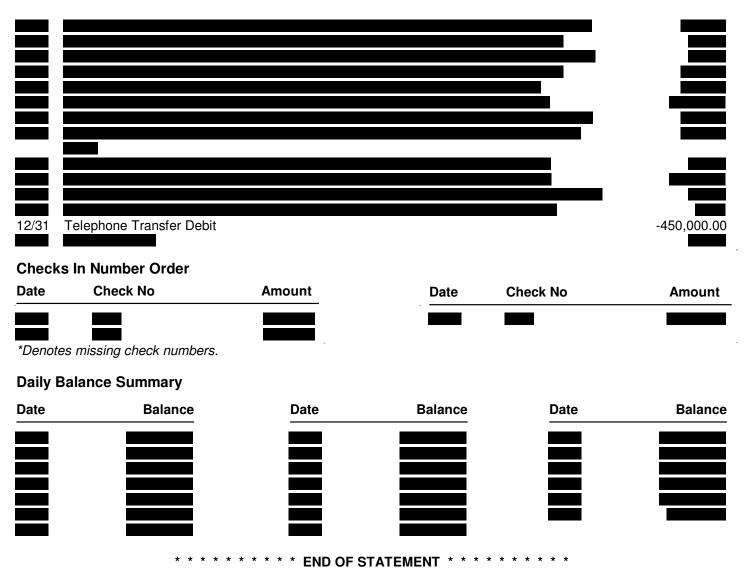


Exhibit 9 - 8 of 8

Exhibit 10

Local Politics The Seattle Times

GOP gubernatorial candidate Joshua Freed goes back and forth on \$500K campaign loan

Feb. 14, 2020 at 6:00 am | Updated Feb. 25, 2020 at 12:45 pm



Joshua Freed, a former Bothell mayor, is a GOP candidate for governor. (Freed campaign photo)



By Jim Brunner **J** Seattle Times political reporter

Last September, gubernatorial candidate Joshua Freed loaned \$500,000 to his campaign, seeking to establish himself as the top Republican challenger to Gov. Jay Inslee's bid for a third term.

In a campaign filing this week, Freed reported he'd taken the loan back. But state law says he can't do that. Legally, he's in for a dime, in for a half-million.

After being asked about the repayment, Freed said in a text Thursday he had "already started" to transfer the money back to the campaign account. He called it a "technical accounting error" and that he wants the money counted as a direct contribution, not a loan.

In this week's filing, Freed's campaign reported it had refunded the entire \$500,000 personal loan on Jan. 31. But state law limits loan repayments to candidates to \$6,000 in a primary and another \$6,000 in the general election. Anything beyond that has to stay with the campaign — a requirement that exists to prevent candidates from using a big loan to scare off competitors and later taking the money back.

The former Bothell mayor and homebuilder gave somewhat conflicting accounts of what happened. On Wednesday, Freed said in a text that when he jumped into the governor's race, "I put money in as a loan" but later decided he didn't want it showing up that way on his campaign books. On Thursday, he said the \$500,000 had been "initially mischaracterized as a loan."

He said having a loan on the books made it appear as if his campaign had higher liabilities and didn't properly show his cash on hand.

In any case, Freed dismissed the transfers as irrelevant and said he wanted to spend his time talking about "the issues facing our state and my solutions for Washingtonians."

The loan repayment was noted by another Republican gubernatorial candidate, Maple Valley program manager Anton Sakharov, who vented in a Facebook post: "This sounds like a campaign violation. This is not a good look for a candidate or for the Republican Party."

Kim Bradford, a spokeswoman for the state Public Disclosure Commission (PDC), said the agency has been in touch with the Freed campaign about the state laws surrounding candidate loans, and "offered to work with them if they are going to put the money back in, on how to do that properly."

Even without the loan, Freed has raised \$287,000 — more than any other Republican gubernatorial candidate, PDC reports show.

In his campaign, Freed has emphasized the state's homelessness crisis, saying it represents a failure of leadership by Inslee and other Democrats. He has pledged to not take a salary if elected, saying he'd donate the money to homeless shelters and drug-rehabilitation facilities.

When he entered the gubernatorial race last September, Freed was among a handful of candidates challenging Inslee — all relatively unknown on a statewide basis.

But in November, Tim Eyman, a longtime sponsor of anti-tax initiatives, announced he would also run for governor. Eyman initially said he'd run as an independent, but this week said he'll campaign as a Republican.

While he's never run for office, Eyman is as well-known as any politician in Washington state. A KING 5 poll this month found him with the most support among Inslee's challengers.

It's unclear to what extent a \$500,000 personal campaign boost by Freed — and he says he might put in more — can overcome Eyman's name-identification advantage. With the cash committed, he'll find out. In a text, Freed said he is "building strength as I campaign full time around the state."

He's planning a formal campaign kickoff breakfast March 5 in Bellevue.

Jim Brunner: 206-515-5628 or *jbrunner@seattletimes.com*; on Twitter: *@Jim_Brunner*. *Seattle Times political reporter Jim Brunner covers state, local and regional politics.*

View 33 Comments

https://www.seattletimes.com/seattle-news/politics/gop-gubernatorial-candidate-joshua-freed-goes-back-and-forth-on-500k-campaign-loan/?utm_medi... 3/3

Exhibit 11

On Wed, 24 Jun at 7:11 PM , Mark Lamb <mark@northcreeklaw.com> wrote: Alice,

Thanks for your response.

It isn't clear to me what the bank records for the campaign would establish about the character of a contribution versus a loan, can you please elaborate on this point? The campaign is not disputing that the monies were given from Mr. Freed to the campaign, but if the reports themselves are the issue the campaign will amend to reflect a contribution and refund of the same.

Thank you.

Best,

Mark Lamb

On Wed, 8 Jul at 12:55 PM , PDC Support <pdc@pdc.wa.gov> wrote: Hi Mark,

As mentioned previously, staff would like to review the records to gain clarity regarding the nature of the transactions between Mr. Freed and his campaign. As the campaign is required by RCW 42.17A to maintain its financial records for five years, staff assume that providing these records will not present any issues for your client.

Staff do not need a further explanation at this time, but will follow up with you after a review of the records. I am out of the office Thursday and Friday and look forward to reviewing the records Monday.

Thank you.

To respond, please reply to this email.

Alice Fiman Compliance Officer toll free 877-601-2828

On Wed, 8 Jul at 8:32 PM , Mark Lamb <mark@northcreeklaw.com> wrote: Alice,

Thanks for your prompt response.

Respectfully, I think we are talking past each other and would request a conference with you and the Executive Director next week. While you are correct the campaign is required to maintain banking records it is not required to produce them to the government on demand without for any reason. My question is pretty straightforward, and to be clear we have no objection to producing them provided there is a rational basis.

Exhibit 11 - 1 of 2

Look forward to speaking with you Monday or later next week.

Best,

Mark

Mark Lamb

Exhibit 11 - 2 of 2

Exhibit 12

On Wed, 22 Jul at 1:17 PM , PDC Support $<\!\!pdc@pdc.wa.gov\!\!>$ wrote: Hi Mark,

Thank you for the documents. Due to the discrepancy between the records you provided and the PDC reports originally filed to report the loan to the campaign and subsequent expenditure to Mr. Freed, the PDC is requesting unredacted records by COB July 23, 2020. Any PII, inlcuding account numbers, may be redacted.

To respond, please reply to this email.

Thank you, Alice Fiman Compliance Officer toll free 877-601-2828

Exhibit 12 - 1 of 1