

Respondent Name	
	John Ley
Complainant Name	
	Jonathan Alvarado
Complaint Description	
<u>Complaint #1</u>	
<p>Johnny reported via the portal (<i>Thu, 30 Jul 2020 at 4:09 PM</i>)</p> <p>Mr. Ley has consistently shown that he is perpetually late in filing his reports as shown below. This disregard for deadlines and rules is unacceptable.</p> <ul style="list-style-type: none"> ♣ Filed initial C4 for May on 6/23 (should have been filed on 5/20 – 35 days late). ♣ Had his regular May C4 due on 6/10, filed on 6/23 (13 days late). ♣ Filed a C3 on 6/18 covering contributions received between 5/16 and 6/13. This should have been separated into 3 separate C3 that covered: <ul style="list-style-type: none"> o 5/16-5/31 (due 6/10) (8 days late) o 6/1-6/7 (due 6/8) (10 days late) o 6/9-6/14 (due 6/15) (3 days late) ♣ On 7/9 he filed a C3 with contributions dating between 6/12 and 7/9. The 6/12 contribution should have been filed on 6/15. (7/9 makes it 25 days late). <ul style="list-style-type: none"> o On that same C3 he had contributions dated 6/19 that should have been filed on 6/22 (7/9 makes them 18 days late). o On that same C3 he had contributions dated 6/24 & 6/28 that should have been filed on 6/29 (7/9 makes them 11 days late). ♣ On 7/15 he filed a C4 that was due on 7/14 (1 day late). ♣ On 7/13 he loaned the campaign \$10,000. This loan was reported on a C3 dated 7/20. It should have been reported on 7/14 (6 days late). Also, it is above the \$6000 per election limit. It should have been reported as \$6000 primary/\$4000 general. ♣ That 7/20 C3 includes contributions ranging from 7/10-7/14. The ones on 7/10 & 7/12 should have been reported on 7/13 (7 days late). ♣ Filed a C3 on 7/28 with a contribution dated 7/22. That should have been reported on 7/27 (1 day late). 	
<u>Complaint #2</u>	
<p>Johnny reported via the portal (<i>Thu, 30 Jul 2020 at 4:31 PM</i>)</p> <p>Mr. Ley is obfuscating where his money is being spent. It needs to be clear to the PDC and public where the money that he is spending for his campaign is going, what exactly it's going to, and who specifically is helping him.</p>	

Examples below:

On the 5/31 C4 (filed 13 days late) these expenses have inadequate descriptions:

- o \$1075.33 – International Graphics: Sign stickers (how many?)
- o \$200.00 – John Ley in-kind video production (No subvendor. Who did he pay for video production?)
- o \$299.00 – John Ley in-kind yard signs. (No subvendor. Who did he pay for yard signs? How many yard signs?)

♣ On the 7/13 C4 (filed 1 day late) these expenses have inadequate descriptions:

- o \$100.00 – John Ley in-kind sign crew gas. (No subvendor. Did he just give someone \$100 to go buy gas?)
- o \$791.66 – John Ley in-kind yard signs. (No subvendor. Who did he pay for yard signs? How many yard signs?)

♣ On the 7/27 C4 this expense has an inadequate description:

- o \$3845.24 – Columbia Litho: “Printing – mailers” (How many pieces?)

Complaint #3

Johnny reported via the portal (*Thu, 30 Jul 2020 at 4:43 PM*)

On 7/13 Mr. Ley loaned the campaign \$10,000. This loan was reported on a C3 dated 7/20 (link to this C3 above).

It should have been reported on 7/14, making it 6 days late, but most importantly, it is above the \$6000 per election limit. It should have been reported as \$6000 primary/\$4000 general. How do we know he is not spending it all before the Primary?

This is the third time that Mr. Ley has been a candidate. When taking on the roll as his own treasurer at this point, he should have a full understanding of the laws, rules and regulations regarding PDC law and filings, as well as how much a campaign is allowed to loan itself during a specific time period.

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

Complaint #1

Disregard for deadlines and PDC laws is not a trait the that public would want to see in one of their potential elected officials. Especially when it is consistently reoccurring.

Complaint #2

Omitting important information does not portray a sense of transparency to the public.

Complaint #3

The public should be able to trust that all campaigns are being fairly run and that each candidate is abiding by the laws that are put forth for them.

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

Complaint #1

6/23- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100978467>

6/23- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100983890>

6/18- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100977390>

---6/24- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100978551>

---6/24- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100978553>

---7/2- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100979935>

7/9- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100981405>

7/15- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100983993>

7/20 (Showing \$10k loan) <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100985018>

7/28- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100987256>

Complaint #2

5/31 C4- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100978467>

7/13 C4- <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100983890>

7/27 - <http://web.pdc.wa.gov/rptimg/default.aspx?repno=100987261>

Complaint #3

<http://web.pdc.wa.gov/rptimg/default.aspx?repno=100985018>

List of potential witnesses with contact information to reach them

Certification (Complainant)

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.