

Respondent Name

Matthew Larkin

Complainant Name

Dennis Paul

Complaint Description

Returns (Fri, 11 Sep 2020 at 3:18 PM)

I am filing a complaint against Attorney General candidate Matt Larkin for concealing in-kind contributions to his campaign and accepting over-limit contributions.

On 8/10/20, 8/24/20 and 8/30/20, Matt Larkin's campaign posted a public video on a Facebook page designed to conduct campaign meetings & business entitled "Matt Larkin for Attorney General Volunteer Group". These meetings were advertised to the public on Larkin's main campaign page and have been shared by GOP activists across the state.

In the 3 videos relevant to the August C-4 (filed 9/10), Campaign Manager Payton LaFerla broadcasted from his campaign office inside the Woodinville corporate headquarters of Matt Larkin's business (ROMAC Industries Inc). During the 8/10 volunteer meeting, LaFerla went into further detail while listing places supporters could pick up yard signs and campaign literature. LaFerla said he was personally "right on the border of Snohomish & King [counties], so if you want signs or literature or something from me, let me know also. I'm at ROMAC right now, which is Matt's [Larkin] family business and we can meet here."

Larkin regularly identifies himself the owner of ROMAC industries, including multiple references in his campaign material. The videos, which are currently public at the time of this submission, can be viewed here:

[August 10, 2020 Video](#)

[August 24 2020 Video](#)

[August 30 2020 Video](#)

*Backups available if originals become deleted.

Mr. Larkin's campaign manager is engaging in campaign activity from a private business and is offering to use the private business as a meeting location for future campaign activity (transferring lawn signs and literature). A reasonable person would conclude from this video that this is not the first campaign activity that ROMAC Industries, Inc. has hosted for Mr. Larkin, and that Mr. Larkin's campaign is storing signs and literature at ROMAC Industries, Inc. From these statements, it is clear that ROMAC Industries, Inc. is making an in-kind contribution to the Larkin campaign in the form of office space and storage.

Mr. Larkin, however, has concealed these in-kind contributions from his C3 and C4 reports. He has not reported any in-kind contribution or cash spending for campaign office space. Moreover, ROMAC Industries, Inc. contributed \$4,000 to candidate Larkin on December 21, 2019, so any in-kind contribution since then constitutes not only concealment, but an over-limit contribution.

What impact does the alleged violation(s) have on the public?**List of attached evidence or contact information where evidence may be found****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.

Respondent Name

Matt Larkin

Complainant Name

Dennis Paul

Complaint Description

Returns (Mon, 14 Sep 2020 at 11:27 AM)

Attorney General candidate Matt Larkin exceeded contribution limits set forth in RCW 42.17A and subsequently falsified his campaign reporting to conceal the over-limit contribution.

On 7/23/20, Mr. Larkin held an online campaign fundraising auction. Prior to, and during the auction, he advertised multiple week-long stays at two separate properties -- Cle Elum's Suncadia resort and a vacation cabin in Seeley Lake, Montana.

During the event, [recorded here](#), Mr. Larkin and his campaign staff continuously thanked and recognized a contributor named Gigi Talcott for donating 2 weeks at her Suncadia rental and 1 week at her Seeley Lake, Montana vacation home. [As seen at timestamp 32:55](#), The value of the Suncadia rental was announced during the auction at \$600/night (for a total of \$3600/week) and Larkin listed the value of the Montana home on his AUD Report dated 9/10 as \$1,176. Altogether, Gigi Talcott's in-kind and cash contributions to Larkin's campaign total at least \$8,276.

In order to accept this over-limit contribution, Mr. Larkin falsified his campaign financial reports.

[As seen in the video \(timestamp 33:25\)](#), at auction the Suncadia weeks sold for \$3,750 & \$3,500, and the rental of the Montana property sold for \$700 (Mr. Larkin, however, reported contributions of \$3250 & \$3500 for the Suncadia weeks on his AUD reports). In an effort to make the Talcott's over-limit contributions appear legal, Larkin under-reported the value of each Suncadia week at \$1750 -- half of the \$3600 value reported during the event (timestamp 32:56 of video), and half the rate of any comparable property in the area, according to AirBnB & VRBO.

Moreover, the in-kind contribution of the Montana cabin was illegally structured in Larkin's 9/10 AUD report, crediting Burt Talcott of Fircrest WA instead of the true owners of the property; Gigi & Ron Talcott of Gig Harbor WA. Missoula County (MT) property records show the Seely Lake, MT cabin sold at auction is [owned by Ron & Gigi Talcott's trust](#). Records show Burt Talcott does not own any property near Seeley Lake, MT nor in any part of Missoula County. Gigi Talcott was thanked during the auction as the owner & builder of the Montana vacation home ([timestamp 27:52 of video](#)).

Finally, Matt Larkin appears to have submitted 3 separate AUD (Auction Disclosure) reports since the auction. One AUD report claims the auction date was 7/27, another 7/29, and yet another 9/1. The auction was 7/23.

In summary, Mr. Larkin falsified his C-4 to conceal contributions over the maximum limits. This indicates Mr. Larkin knew that his committee was in violation of the law, and willfully falsified his report to hide this violation from the public. This is a serious offense.

What impact does the alleged violation(s) have on the public?**List of attached evidence or contact information where evidence may be found****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.