



**State of Washington**  
**PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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**Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)**

December 18, 2020

Sent electronically to [myricks@myrickslaw.com](mailto:myricks@myrickslaw.com)

Subject: Complaint filed by Kan Qiu, PDC Case 77237

Dear Toussaint L. Myricks, Esq, counsel for Washington Against Discrimination Everywhere:

Enclosed is a copy of an electronic letter concerning a complaint filed September 25, 2020 with the Public Disclosure Commission (PDC) alleging Washington Against Discrimination Everywhere (Committee) violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures.

As noted in the letter to Kan Qiu, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(d), however, this letter serves as a formal written warning concerning the Committee's failure to timely report debt as required. Staff expects the Committee will, in the future, timely and accurately disclose contributions and expenditures, including debt, as required by law. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Peter Lavalley  
Executive Director



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December 18, 2020

Sent electronically to [kanqmail@gmail.com](mailto:kanqmail@gmail.com)

Subject: Complaint regarding Washington Against Discrimination Everywhere, PDC Case 77237

Dear Kan Qiu:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed September 25, 2020. Your complaint alleged Washington Against Discrimination Everywhere violated RCW 42.17A.235 and .240 by failing to timely and accurately disclose contributions and expenditures.

PDC staff reviewed the allegations; the documents you provided; the applicable statutes, rules, and reporting requirements; the applicable PDC reports; and the response from Toussaint L. Myricks, counsel for Washington Against Discrimination Everywhere, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- Washington Against Discrimination Everywhere (Committee) registered with the PDC on June 18, 2020, as a continuing ballot-proposition Committee, Supporting #1776 Washington Anti-Discrimination Act, under full reporting.
- As of November 11, 2020, the Committee filed three Monetary Contributions (C-3) reports and two Summary Receipts and Expenditure (C-4) reports, listing \$2,000.01 in contributions and \$2,000 in expenditures during the 2020 campaign, with debt of one cent.
- In response to the complaint, Myricks stated "The leadership team of the Washingtonians Against Discrimination Everywhere have confirmed that no contributions have been made to the campaign of the type alleged in the complaint and that no expenditures have been made for any previously incurred expenses at this time. Therefore, the campaign has not engaged in any activity in violation of either RCW 42.17A.235 or RCW 42.17A.240. The services provided by the Docusign company have been documented on an invoice which has been received by the campaign but no expenses have been incurred in payment of this invoice. Any expenses to be incurred have been deferred on mutually agreeable terms between the company and the campaign. And, once expenditures are made pursuant to such expenses, those expenditures will be immediately documented and reported to the PDC."
- Once provided instructions for reporting debt provided under WAC 390-16-042, the Committee filed a C-4 report on December 11, 2020 listing \$25,000 in liabilities and \$24,999.99 deficit balance.

- On Schedule B of the C-4 report filed December 11, 2020, the Committee listed an expenditure made July 31, 2020 to DocuSign for ‘online handwritten signatures’, with \$25,000 amount owed. The expenditure was reported 93 days late.

Based on these findings, staff has determined in this instance, the Committee’s failure to timely and accurately disclose contributions and expenditures does not amount to a finding of a violation that warrants further investigation.

However, pursuant to WAC 390-37-060(1)(d), Washington Against Discrimination Everywhere will receive a formal written warning concerning the failure to timely report the debt to DocuSign. The formal written warning includes staff’s expectation the Committee will, in the future, timely and accurately disclose contributions and expenditures as required by RCW 42.17A.235 and .240. The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_  
Peter Lavalley  
Executive Director