

Respondent Name

Democratic Association of Secretaries of State

Complainant Name

Glen Morgan

Complaint Description[Glen Morgan](#) (Wed, 14 Oct 2020 at 1:54 PM)

To whom it may concern,

It has come to my attention, once again, that the Democratic Association of Secretaries of State PAC appears to have violated Washington State's campaign finance laws (**RCW 42.17A**). Please note, these are in addition to the complaint I recently filed and can be treated as a supplement to that complaint. The details are as follows:

1) Failure to list top 5 contributors in campaign advertisement (Violation of RCW 42.17A.350, .320)

After filing the earlier complaint about the more obvious violations of Washington State's campaign finance ads by this dark money, out of state, mega PAC, I stumbled on at least some of the campaign advertisements this PAC funded. Presumably (and this can only be assumed because as I detailed earlier, the C4 filed by this PAC failed to disclose the details), this ad was part of the nebulous \$83,000+ expenditure detailed in their lone C4 filed to date (PDC Tracking **#101006604**). I've attached two examples from the front page of the electronic version of the Seattle Times (dated 10/14/2020).

Example #1 – under the Seattle Times masthead is an advertisement that provides no listed top 5 contributors or disclosure statement as required by **RCW 42.17A.350** (See **WAC 390-05-290**, **WAC 390-18-010 (5)**, **WAC 390-18-025**, etc)

Example #2 – a sidebar ad which does list top 5 contributors

The violation here primarily rests with the ad featured in Example #1, and clearly this not only fails to specify the top 5 contributors for this ad, but there is no complete disclosure statement, which can be found in the other ad which appears in the Seattle times at the same time. Both ads, when clicked by a user will send that user to the candidate Gael Tarleton's website.

Due to this campaign's unwillingness to comply with basic campaign finance reporting details, it is currently unknown the true extent of the failure to report the details of these independent expenditures during the critical 21-day window before an election. It bears repeating that this violation could be resolved by both providing the appropriate level of detail on these expenditures (**WAC 390-16-205**).

However, the PDC staff may be required to request this level of information to verify just how widespread these violations have become (how many other sites have digital advertisements without disclosure statements or top 5 contributors?).

I'll inform the PDC if I find any additional violations, but this should be added to the original complaint I filed earlier today.

Best Regards,

Glen Morgan

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

Again, secretive advertisements by dark money PACs who have failed to disclose their contributors, how their vendors spend the expenditures or properly disclose the top 5 contributors on the advertisements are clear violations of Washington State's campaign finance laws.

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

see attached

List of potential witnesses with contact information to reach them

All officers and probably the listed vendor as well.

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.

**SUMMARY, FULL REPORT
 RECEIPTS AND
 EXPENDITURES**

C4 (3/97)	PDC OFFICE USE
	101006604
	10-13-2020

Candidate or Committee Name (Do not abbreviate. Include full name)
Democratic Assoc of Sec of State (WA)

Mailing Address
777 S Figueroa St Suite 4050

City
Los Angeles, CA

Zip + 4 90017	Office Sought (Candidates)	Election Date 2020
Report Period Covered 09/01/20	From (last C-4) 09/01/20	To (end of period) 10/12/20
Final Report?		Yes No X

***For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS		*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)		\$		\$1,103,437.63
2. Cash received (From line 2, Schedule A)		\$	\$0.00	
3. In kind contributions received (From line 1, Schedule B).....			\$0.00	
4. Total cash and in kind contributions received this period (Line 2 plus 3).....				\$0.00
5. Loan principal repayments made (From line 2, Schedule L).....			\$0.00	
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)			\$0.00	
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)				\$0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)				\$1,103,437.63
9. Total pledge payments due (From line 2, Schedule B).....	\$0.00			

EXPENDITURES	
10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$0.00
11. Total cash expenditures (From line 4, Schedule A)	\$85,650.00
12. In kind expenditures (goods & services) (From line 1, Schedule B)	\$0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....	\$85,650.00
14. Loan principal repayments made (From line 2, Schedule L).....	\$0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	\$0.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)	\$0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....	\$85,650.00

CANDIDATES ONLY

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:
(213) 452-6565

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17)..... <small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	\$1,017,787.63
19. Liabilities: (Sum of loans and debts owed)	\$0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)	\$1,017,787.63

CERTIFICATION: I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Nellie Gorbea	10/13/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE
to C4 **A**
(11/93)

2

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

Report Date

09/01/20 10/12/20

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

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

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 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
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.
- 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	\$0.00
09/04/20	Friends of Gael PO Box 9100 Seattle, WA 98109	C	Contribution	\$2,000.00
10/08/20	SKDKnickerBocker 1150 18th St NW, Ste 800 Washington, DC 20036	I	Digital Ads. Independent Expenditure to Support Gael Tarleton	\$83,650.00

Total from attached pages \$ \$0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ \$85,650.00



PROTECT YOUR VOTING RIGHTS 

*** VOTE * Gael Tarleton ***

DEMOCRAT SECRETARY OF STATE

★ **VOTE** ★

**Gael
Tarleton**★

**DEMOCRAT SECRETARY
OF STATE**



**PROTECT YOUR
VOTING RIGHTS**

No candidate authorized this ad. Paid for by Democratic Association of Secretaries of State, 777 S Figueroa St Suite 4050, Los Angeles, CA 90017, Nellie Gorbea, Treasurer. Top Five Contributors: International Union of Operating Engineers, PhRMA, Comcast Corporation, TBA of NJ LLC, Machinists Non-Partisan Political League General Fund