



**STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION**

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

23rd Legislative District Republican
Committee

Respondent.

PDC Case 80600

Report of Investigation

I.

Background, Complaint and Allegations

- 1.1 23rd Legislative District Republican Committee (Committee) is a bona fide legislative district party committee, registered with the Public Disclosure Commission since prior to 2007.
- 1.2 On April 1, 2019, the Committee filed a Political Committee Registration (C-1pc report) as a continuing committee, selecting the Full Reporting option and listing April Ferguson as Chair and Mark Debenon as Treasurer.
- 1.3 On June 30, 2020, the Committee filed an amended C-1pc report listing David Lindquist as Treasurer.
- 1.4 On July 13, 2021, the Committee submitted an amended C-1pc report listing April Ferguson as Manager and Chair, and David Lindquist as Treasurer.
- 1.5 On October 19, 2021, the Committee submitted an amended C-1pc report listing April Ferguson as Manager and Chair, David Lindquist as Treasurer, and Dave Simpson as Bookkeeper/PDC Filer.
- 1.6 In calendar year 2020, 23rd Legislative District Republican Committee was registered with the PDC as a continuing political committee, filing Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4

reports) that disclosed \$13,130 in total contributions received and \$14,446 in total expenditures made.

- 1.7 On November 9 and 10, 2020, Elaina Gonzales-Blanton filed complaints with the PDC alleging that the Committee violated: (1) RCW 42.17A.220 for failure to timely deposit contributions; (2) RCW 42.17A.235 & .240 for failure to timely and accurately disclose contributions and expenditures; and (3) RCW 42.17A.235 & WAC 390-16-043 for failure to provide accurate books of account during the public inspection period occurring prior to the November 3, 2020 General Election. **(Exhibit #1)**
- 1.8 The Complainant is a member of the Committee and stated that she had previously requested to see a treasurer's report, but that none had been supplied at the Committee meetings. In addition, Ms. Gonzales-Blanton stated that she had offered assistance to the new treasurer, David Lindquist, and that although initially agreeable, he subsequently failed to respond.
- 1.9 Chair Ferguson increased her involvement in the Committee's finances by acting in an assistant treasurer capacity which may have contributed to the reporting issues that resulted in a complaint being filed.
- 1.10 The Committee's initial response was received December 11, 2020 by the PDC from Committee Chair April Ferguson and Treasurer David Lindquist. **(Exhibit #2)**

II.

Investigative Findings

Reporting Requirements

- 2.1 Political committees that selected the Full Report option and participated in the 2020 primary and general elections by making or receiving contributions, were required to file the following reports in calendar year 2020.
 - Monetary contributions were required to be deposited within five business days of receipt, and the Committee is required to file one C-3 report for each bank deposit. Monthly C-3 reports are due to be filed by the 10th of each month disclosing contributions received and deposited during the previous month, and weekly C-3 reports are required to be filed every Monday beginning June 1 through November 2, 2020.
 - Monthly C-4 reports are required to be filed for the periods January 1 through May 31, 2020, December 1 through 31, 2020, 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 was filed.

- A 21-day Pre-Primary Election C-4 was required on July 14, 2020, covering the period June 1 through July 13, 2020; and a 7-day Pre-Primary Election C-4 report was required on July 28, 2020, covering the period July 14 through July 27, 2020.
- Special reports are required July 28 – August 3, 2020 and October 13 – November 2, 2020 if the committee makes or receives contributions of \$1,000 or more from one source.
- A Post-Primary Election C-4 report was required by September 10, 2020, covering the period July 28 through August 31, 2020.
- A 21-Day Pre-General Election C-4 report was required on October 13, 2020, covering the period September 1 through October 12, 2020; and a 7-day Pre-General election C-4 report was required on October 27, 2020, covering the period October 13 through October 26, 2020.
- A Post-General Election C-4 was required by December 10, 2020, covering the period October 27 through November 30, 2020.
- During the eight days prior to the August 4, 2020 primary election and during the eight days prior to the November 3, 2020 general election, “books of account” current as of the previous business day, were required to be available for public inspection by appointment.

Committee Reporting Overview

- 2.2 On February 11, 2020, the Committee filed its initial C-4 report for calendar year 2020, disclosing \$1,442 in funds carried forward from the end of calendar year 2019, \$4,039 in total deposits during the month of January 2020, and \$2,907 in monetary expenditures for the month of January 2020.
- 2.3 The Committee received the majority of contributions from its members and disclosed the contributions either as “un-itemized” \$25 or less, or as proceeds from low-cost fundraisers.
- 2.4 The Committee spent most of its funds on general overhead, party building, “get out the vote” efforts and sale of campaign items for the 2020 Trump Presidential Re-Election Campaign.

Timely Deposit of Contributions

- 2.5 The Committee filed 34 original C-3 reports on or before the due date. However, 31 of the C-3 reports disclosed individual contributions that were deposited between 1 and 217 days beyond the required five business days.

Timeliness of Reporting Expenditures

- 2.6 The Committee made three contributions totaling \$700 to three separate 2020 State House and Senate candidates that were disclosed on the 7-Day Pre-General Election C-4 report and filed November 3, 2020, seven days late.
- 2.7 The Committee filed 12 monthly and election related C-4 reports. Three of the 12 C-4 reports were filed disclosing zero in total receipts and \$56.99 in total expenditures, and were filed on or before the due date. The remaining nine C-4 reports disclosed \$12,630.88 in total receipts and \$13,889.24 in total expenditures and were submitted between 1 and 185 days late.

Maintaining Accurate Books of Account

- 2.8 In her communication with PDC staff, Chair Ferguson affirmed that the Committee's financial records were incomplete during the transition and training of the new Treasurer, David Lindquist.
- 2.9 Staff's review of the Committee's C-3 and C-4 reports show that the records were not complete nor accurate at the time of the inspection on November 3, 2020 due to Mr. Lindquist's inexperience, the limited in-person interactions allowed during COVID restrictions and the physical distance between the Chair, the Treasurer and the Committee's bank.

Response from the Committee Regarding Late Deposits & Late Reporting

- 2.10 In the response, Chair Ferguson stated that during calendar year 2020 the Committee was hampered by the March 2020 resignation of the Committee Treasurer followed by a prolonged period of time before a replacement could be found due to COVID restrictions on in-person meetings of the Committee members. In addition, Chair Ferguson stated that after a new Treasurer was elected, it was impracticable to turn over the Committee's bank account information and other treasury responsibilities until September 11, 2020. These circumstances lead to the late deposits and late reporting.

- 2.11 Treasurer Lindquist stated that he had no accounting or treasury experience, that he was already employed full-time and could not conduct banking activities during business hours. He further stated that he had no computer or printer at his home, which meant that he had to travel to the county party offices to file PDC reports.

Response from the Committee Regarding Inspection of Records

- 2.12 In her response, Chair Ferguson stated that Elaina Gonzales-Blanton requested to inspect the Committee records and would be accompanied by Pam Madden-Boyer, both of whom were personally known by her and David Lindquist. Chair Ferguson asserted that the inspection was brief due to Ms. Gonzales-Blanton's and Ms. Madden-Boyer's repeated attempts to record and photograph during the inspection without consent. Both parties made calls to 9-1-1, resulting in termination of the in-person meeting.

Other Findings

- 2.13 Chair Ferguson provided details regarding additional accounting errors, missed expenditures or other minor corrections, and worked with PDC Filer Assistance staff to submit new or amended reports.
- 2.14 Staff found that although Chair Ferguson's increased involvement in the Committee's finances after March 2020 may have been detrimental to the Committee's compliance in the short term, it is staff's belief that Chair Ferguson's intentions were good and that she believed it was her duty as Chairwoman to help bring the Committee back into compliance during the transition of the new Treasurer.

III. Scope

- 3.1 PDC staff reviewed the following documents:
1. Complaints filed against 23rd Legislative District Republican Committee (CY 2020), received from Elaina Gonzales-Blanton on November 9 and 10, 2020.
 2. A response to the complaint submitted by Chair Ferguson and Treasurer Lindquist on December 11, 2020.
 3. C-3 reports of contributions, and C-4 reports of contributions and expenditures, filed by former Treasurer Mark Debanon and current Treasurer David Lindquist.
 4. Additional written communications from Chair Ferguson received between December 1, 2020 and November 17, 2021.

IV. **Statute and Rule**

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report; on the twenty-first day and the seventh day immediately preceding the date on which the election is held; and on the tenth day of the first month after the election.

In addition, political committees are required to maintain campaign books of accounts and records to verify the information disclosed on the C-3 and C-4 reports and keep the information current within one business day.

RCW 42.17A.220 states that all monetary contributions received by a candidate or political committee shall be deposited by candidates, political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

WAC 390-16-043 includes the statutory definition of “books of account” as “a ledger or similar listing of contributions, expenditures, and debts, such as a campaign or committee is required to file regularly with the commission, current as of the most recent business day.” The rule also establishes requirements for the timing and method of both making a request to view campaign books of account and responding to such a request.

Respectfully submitted this 7th day of December, 2021.

Electronically signed by Jennifer Hansen

Jennifer Hansen
PDC Compliance Officer

List of Exhibits

- | | |
|-------------------|--|
| Exhibit #1 | Complaints filed with the PDC by Elaina Gonzales-Blanton against 23 rd Legislative District Republican Committee (CY 2020), received November 9 and 10, 2020. |
| Exhibit #2 | Response to complaint, submitted by Chair Ferguson and Treasurer Lindquist, on December 11, 2020. |

PDC Exhibit 1

Respondent Name
23 rd Legislative District Republican Committee
Complainant Name
Elaina Gonzales-Blanton
Complaint Description
<p>Elaina (Tue, 10 Nov 2020 at 5:40 PM)</p> <p>April Ferguson has not done her job to see that the 23rd LD Financials have been recorded in a timely manner and with her own personal finances in upheaval I have concern with theft occurring.</p>
What impact does the alleged violation(s) have on the public?
It violates the public trust rules.
List of attached evidence or contact information where evidence may be found
<p>Emails</p> <p>PDC reports</p> <p>Ledger</p> <p>April Ferguson Financial Records</p>
List of potential witnesses with contact information to reach them
<p>Pam Madden-Boyer</p> <p>Katie Madden</p>
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.

MEMO

To: PDC

Fr: Pamela Madden Boyer & Elaina Gonzales Blanton

Re: Complaint on financial irregularities 23rd LD Republican, Chairwoman Ferguson

Pam MB and Elaina GB have repeatedly raised concerns over having no treasurers reports for 7 or 8 months. Finally we were able to get a ledger from the previous treasurer and I had Katie Kuzkin, bookkeeper, audit the ledger and PDC records. As per the attachments included, you will find discrepancies noted on page 3. Then 2 people overheard a conversation between Chairwoman Ferguson and someone with whom she was speaking to on the phone. We have a notarized document from Dawn M stating that she overheard Ms Ferguson telling someone to "fix the books". Also included is an email from Kitsap Republican County Chairman Tony Stephens referring to the books not being properly done. It was easy to assess that there were large gaps of nonreporting.

It is of concern due to the PDC rules and RCW 42.17A.710 that reporting of personal finances is required due to potential "conflicts of interest". Due to threats against Pam MB and Elaina GB, by Chairwoman Ferguson, we decided it might be prudent to see if anything in Ms. Fergusons personal finances stood out as a concern. What was discovered on Kitsap County Auditors website as well as additional public documents on the countys website is as follows:

- Lien filed on Fergusons home from a frivolous lawsuit that she lost
- Approximately 5 times when Fergusons home was in preforeclosure
- Lawsuits from the state of Washington Dept of Revenue and L & I
- Multiple examples of additional financial liabilities

You will find all of these aforementioned documents attached.

As per the PDC rules we did request a public viewing of the financial records. Included you will find my attempt to assist new treasurer David Lindquist. Initially he wanted the help to get things updated correctly, but then failed to respond subsequently. We requested the public viewing which nominally occurred on election day Nov 3. However, Chairwoman Ferguson continued talking during the entire approximately 15 minutes that it lasted, by reading aloud from the RCWs directly across the table from us. The hostility in her manners and demeanor made it impossible to view and assess anything. We did announce that we would like to record the session due to what we knew would be a poor reaction from Ms Ferguson and predictably she wouldn't agree to this, so we stopped. As we were gathering up ourselves to leave, Elaina GB made a brief report to 911 on the situation due to previous incidents involving Ms Ferguson.

2020

DT	CAT	NAME	DEBIT	CREDIT	BALANCE
1/1	BF	Balance Forward		\$1,439.60	\$1,439.60
1/3	POS	AMAZON.COM*VA6GJ88G3 SEATTLE WA	\$21.78		\$1,417.82
1/4	POS	AMAZON.COM*AO6R23FA3 SEATTLE WA	\$76.29		\$1,341.53
1/6	DEP	Square Inc		\$23.97	\$1,365.50
1/6	DEP	Square Inc		\$120.47	\$1,485.97
1/6	CHK	# 1111 - Storage	\$70.00		\$1,415.97
1/7	DEP	Square Inc		\$23.97	\$1,439.94
1/7	POS	WAL-MART BREMERTON WA	\$65.33		\$1,374.61
1/8	DEP	Square Inc		\$96.50	\$1,471.11
1/9	DEP	Square Inc		\$72.22	\$1,543.33
1/9	POS	THE UPS STORE #2154 SILVERDALE WA	\$150.00		\$1,393.33
1/13	DEP	Square Inc		\$72.52	\$1,465.85
1/13	DEP	PAYPAL		\$168.41	\$1,634.26
1/14	DEP	Square Inc		\$144.44	\$1,778.70
1/14	POS	USPS PO 54410204 1998 STA KEYPORT WA	\$55.00		\$1,723.70
1/14	CHK	# 1112- Storage	\$70.00		\$1,653.70
1/15	DEP	Square Inc		\$120.77	\$1,774.47
1/15	POS	FSpdfconverter10 877-3278914 CA	\$54.59		\$1,719.88
1/17	DEP	Square Inc		\$47.94	\$1,767.82
1/17	POS	PARTY CITY 438 9551 RIDGETOP SILVERDALE WA	\$8.70		\$1,759.12
1/18	POS	AMAZON.COM*5J5T889Y3 SEATTLE WA	\$136.00		\$1,623.12
1/18	POS	AMAZON.COM*9X5NA3C33 SEATTLE WA	\$130.68		\$1,492.44
1/21	DEP	Square Inc		\$72.22	\$1,564.66
1/21	DEP	Square Inc		\$72.22	\$1,636.88
1/21	DEP	Square Inc		\$144.74	\$1,781.62
1/21	DEP	Ron Luke		\$175.00	\$1,956.62
1/22	DEP	Square Inc		\$48.25	\$2,004.87
1/22	POS	THE HOME DEPOT #4716 SILVERDALE WA	\$14.17		\$1,990.70
1/22	POS	MICHAELS STORES SILVERDALE WA	\$79.60		\$1,911.10
1/22	POS	360 EVENT RENTAL & SUP BREMERTON WA	\$126.55		\$1,784.55
1/23	DEP	Square Inc		\$23.97	\$1,808.52
1/23	DEP	PAYPAL		\$142.99	\$1,951.51
1/24	DEP	Square Inc		\$71.91	\$2,023.42
1/24	POS	STAPLES 1023 SILVERDALE WA	\$311.47		\$1,711.95
1/24	POS	SMART FOODSERVICE BLVD BREMERTON WA	\$459.07		\$1,252.88
1/24	POS	SMART FOODSERVICE BLVD BREMERTON WA	\$150.80		\$1,102.08
1/24	ATM	ALASKA USA SILVERDALE WA	\$180.00		\$922.08
1/24	ATM	ALASKA USA SILVERDALE WA	\$260.00		\$662.08
1/24	POS	WAL-MART #5272 POULSBO WAWA	\$242.15		\$419.93
1/24	POS	360 EVENT RENTAL & SUP BREMERTON WA	\$62.13		\$357.80
1/24	POS	360 EVENT RENTAL & SUP BREMERTON WA	\$565.06		\$207.26
1/24	ACH	OD Services Fee	\$25.00		\$232.26
1/25	DEP	PAYPAL		\$143.00	\$89.26
1/26	DEP	SQC*ID 3Z87XYFV Visa		\$762.67	\$673.41
1/27	POS	FACEBK ACBJFPAJB2 650-5434800 CA	\$57.79		\$615.62
1/28	ADJ	360 EVENT RENTAL & SUP BREMERTON WA		\$9.81	\$625.43
1/31	DEP	Pancakes & Politics		\$2,064.00	\$2,689.43
1/31	ADJ	Tiered Rate APY Earned 0.04%		\$0.05	\$2,689.48
2/13	CHK	CHK # 1114 - Storage February	\$70.00		\$2,619.48
2/18	CHK	# 1115 - Ralph Adamson	\$310.04		\$2,309.44
2/23	POS	WAL-MART #2317 - Printer Ink	\$55.79		\$2,253.65
2/24	POS	WAL-MART #2317 - Stamps	\$22.00		\$2,231.65
2/25	CHK	# 1118 - Kitsap County Parks P&P	\$1,365.00		\$866.65
2/26	CHK	# 1113 - Gordon Sound P&P	\$509.58		\$357.07

2/28	ATM	Cash Box Change	\$180.00		\$177.07
2/29	DEP	Tiered Rate 0.05%		\$0.08	\$177.15
3/2	DEP	Square Inc - CK Caucus Trump Gear		\$181.33	\$358.48
3/3	DEP	P&P Sponsor/NK Caucus Trump Gear		\$890.00	\$1,248.48
3/5	POS	THE UPS STORE SILVERDALE WA	\$20.86		\$1,227.62
3/5	DEP	CK Caucus Trump Gear		\$338.00	\$1,565.62
3/5	DEP	Bremerton Caucus Trump Gear		\$151.00	\$1,716.62
3/5	DEP	Bremerton Caucus Trump Gear Electronic		\$50.00	\$1,766.62
3/6	DEP	Cash Box Change		\$180.00	\$1,946.62
3/9	CHK	# 1119 - Dave's Campaign and Business Solutions	\$1,197.91		\$748.71
3/13	CHK	# 1120 - Dave's Campaign and Business Solutions	\$300.00		\$448.71
3/18	CHK	# 1121 - Poulsbo Mini Storage	\$70.00		\$378.71
3/18	CHK	# 1122 - Poulsbo Mini Storage	\$70.00		\$308.71
3/31	ADJ	DIVIDEND DEP		\$0.01	\$308.72
5/10	POS	STARBUCKS STORE 00371 SILVERDALE WA	\$21.58		\$287.14
6/9	CHK	# 1124 - Poulsbo Mini Storage	\$70.00		\$217.14
6/9	CHK	# 1125 - Poulsbo Mini Storage	\$70.00		\$147.14
7/8	DEP	BIRW		\$500.00	\$647.14
7/12	POS	POULSBO MINI-STORAGE 800-789-3638 WA	\$70.00		\$577.14
7/17	CHK	# 1126 - Mike Stevens	\$75.00		\$502.14
7/28	DEP	KCRP		\$500.00	\$1,002.14
7/30	POS	STAPLES 00110239 SILVERDALE WA	\$239.78		\$762.36
7/30	POS	USPS PO 54778403 10855 SI SILVERDALE WA	\$210.00		\$552.36
7/30	POS	STAPLES 1023 SILVERDALE WA	\$67.58		\$484.78
7/30	POS	STAPLES 1023 SILVERDALE WA	\$30.50		\$454.28
8/12	CHK	# 1151 - PO Box Fee	\$150.00		\$304.28
8/14	CHK	# 1152 - Poulsbo Mini Storage	\$70.00		\$234.28
9/12	POS	POULSBO MINI-STORAGE POULSBO WA	\$70.00		\$164.28
9/14	DEP			\$130.00	\$294.28
9/14	DEP			\$1,405.00	\$1,699.28
9/18	POS	OFFICE MAX/OFFI 21800 MAR POULSBO WA	\$57.63		\$1,641.65
9/18	POS	SAFEWAY #3148 POULSBO WA	\$121.29		\$1,520.36
9/22	DEP			\$207.00	\$1,727.36
9/23	DEP	PAYPAL		\$1,100.89	\$2,828.25

not reported
till Nov 3

2020 DESCREPCENCIES

DT	NAME	Line Item	AMOUNT
1/1 - 1/31	C4 - 100957721	1	\$ 1,442.60
1/1 - 1/31	C4 - 100957721	2	\$ 4,039.47
1/1 - 1/31	C4 - 100957721	11	\$ 2,907.16
Original Ledger says BAL FWD \$1,439.60			
Original Ledger says total Deposits \$4622.04 - \$9.86 (Adjustments) = \$4612.18 leaving \$572.71 Deposits not documented to the PDC			
Original Ledger says total Expenses \$3372.16 leaving 2 ATM W/D unaccounted for on 1/24 in the amounts of \$180.00 and \$260.00, and \$25.00 NSF totaling \$465.00 not documented to the PDC			

3/18	CHK	# 1122 - Poulsbo Mini Storage	\$70.00	See a skip of checks #s 1116, 1117, 1127-1150
5/10	POS	STARBUCKS STORE 00371 SILVERDALE WA	\$21.58	\$21.58 Personal Expense per mark

7/30	POS	STAPLES 00110239 SILVERDALE WA	\$239.78	EXPENSE ENTERIES NOT DOCUMENTED TO THE PDC
7/30	POS	USPS PO 54778403 10855 SI SILVERDALE WA	\$210.00	
7/30	POS	STAPLES 1023 SILVERDALE WA	\$67.58	
7/30	POS	STAPLES 1023 SILVERDALE WA	\$30.50	
8/12	CHK	# 1151 - PO Box Fee	\$150.00	
8/14	CHK	# 1152 - Poulsbo Mini Storage	\$70.00	

9/14	DEP		\$130.00	
9/14	DEP		\$1,405.00	
9/22	DEP		\$207.00	
9/23	DEP	PAYPAL	\$1,100.89	

DEPOSITS ENTERIES NOT DOCUMENTED TO THE PDC

Total Deposits documented on Ledger \$2842.89

Total Deposits documented on C3 - 101002579 is \$3200.05; Leaving \$357.16 of Deposits undocumented to the PDC

9/12	POS	POULSBO MINI-STORAGE POULSBO WA	\$70.00	EXPENSE ENTERIES NOT DOCUMENTED TO THE PDC
9/18	POS	OFFICE MAX/OFFI 21800 MAR POULSBO WA	\$57.63	
9/18	POS	SAFEMAY #3148 POULSBO WA	\$121.29	

Total \$929.87 of Deposits have not been documented to the PDC for the year 2020 from 1/1-10/20

Total \$1086.78 of Expenses have not been documented to the PDC for the year 2020 1/1-10/20

A personal expense per Mark for \$21.58 has not been refunded to date 10/20/20

Square and Paypal have statements which will need to be pulled in addition to the Bank account in order to do a proper audit.

This is an audit of checks and balances against the "Original Ledger" provided.

23rd LD circular firing squad and other matters.

From: Tony Stephens (kcrpchair@gmail.com)
To: kcrpchair@gmail.com
Bcc: elainaluz@yahoo.com
Date: Monday, October 12, 2020, 05:37 PM PDT

Conservatives Caucus,

As we approach the election and the OM, it is time for cool heads: those who can do their duty on behalf of the team to achieve larger, more important goals than those seemingly important things just in front of us. How we begin will define what we achieve.

We have a Conservative Caucus of people who wish to ensure the Kitsap County Republican Party succeeds in defending our principles. There are a lot of new people to help us with that.

These new people are not interested in drama, and quite frankly drama is the death-knell of an organization. If control over some portion of an organization is the reason for the drama, it becomes a self-defeating scheme. The sort of drama we have been hearing is the exact type which destroys an organization, making it not worth the winning. Of course, no one ever wins in this sort of game, anyway. Everyone loses.

I have heard the 23rd LD Treasury is not properly managed or accounted for, if one looks at the PDC. We are used to a high degree of specificity in PDC accounting, but this is not the norm. I will assist the new 23rd Treasurer to fix the books. This is not a reason for drama. No money has been stolen. The PDC is easy to work with and we can fix any problems.

AFFIDAVIT

STATE OF WASHINGTON
COUNTY OF KITSAP

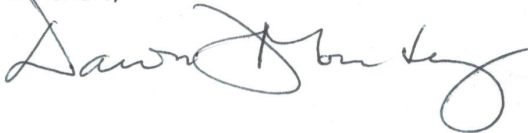
The undersigned, DAWN L MORIARTY, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of State of Washington. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
3. I declare that on the evening/night of September 24, I attended a meeting to discuss mailers for the 23rd LD that included April Ferguson, Pam Madden Boyer and Elaina Gonzales Blanton.
4. I declare that on the evening/night of September 24, the majority of meeting ended up being about April Ferguson's receipt of the Tarra Simmons documents going public and April's fear on how it will affect her personally.
5. I declare that on the evening/night of September 24, April Ferguson was upset, stressed and defensive and requested that no one take the information about the Tarra Simmons that she received publicly or discuss outside the meeting for fear that it would look bad on her, April Ferguson.
6. I declare that on the evening/night of October 6, I assisted April Ferguson along with Elaina Gonzales Blanton in the 'break down' of the campaign table manned by April Ferguson.
7. I declare that on the evening/night of October 6, April Ferguson was upset, stressed while on a phone call at my initial encounter with April Ferguson.
8. I declare that on the evening/night of October 6, April Ferguson was upset, stressed and spoke in defensive tone and broke into tears on at least two occasions while I was assisting her in putting items from the campaign table/site into her vehicle.

I declare that, to the best of my knowledge and belief the information herein is true, correct, and complete.

Executed this 16th day of November, 2020

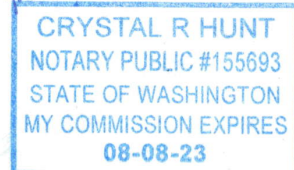
Dawn L Moriarty



State of Washington
County of Kitsap

Signed or Attested before me on 11/16/2020
by Dawn Moriarty
(Name of person appearing)

Notary Public-State of Washington
My appointment Expires: 08-08-2023
Crystal R Hunt Crystal R Hunt



Re: Public Inspection of Committee Financial Records

From: Elaina Gonzales (elainaluz@yahoo.com)

To: pammadboy@gmail.com; Katiemadden2018@gmail.com; aprilforthewin@gmail.com; 1963dbl@gmail.com

Date: Monday, November 2, 2020, 04:32 PM PST



Let's do 3 tomorrow afternoon. Please bring bank statements, and a document (whether hand written or typed) of first & last name / last 4 digits of debit card, Invoices and receipts.

Elaina Gonzales-Blanton

On Nov 2, 2020, at 8:26 AM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

Elaina Gonzales-Blanton

Begin forwarded message:

From: April Ferguson <aprilforthewin@gmail.com>
Date: November 2, 2020 at 7:03:54 AM PST
To: Elaina Gonzales <elainaluz@yahoo.com>
Subject: Re: Public Inspection of Committee Financial Records

This is to confirm 7:00 pm but I may be coming from an event so 7:30 would be better.

They can also be available anytime tomorrow prior to 5:00 pm. I do not have an up to date bank statement so if we want to include the month of October I will have to go get a bank statement and can do that if the inspection is allowed to happen tomorrow. I have not yet received any October statement.

April Ferguson

On Fri, Oct 30, 2020 at 10:06 AM Elaina Gonzales <elainaluz@yahoo.com> wrote:

April,

Please respond to my last email. At the last meeting they decided to not meet on this night because it's the night before the election. You proposed this night, so let's do it at 7.

Thank you,

Elaina Gonzales-Blanton

On Oct 29, 2020, at 9:53 PM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

It's not. The meeting was moved out because of the election.

Elaina Gonzales-Blanton

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(1/02)

THIS SPACE FOR OFFICE USE

101002579

10-02-2020

Candidate or Committee Name (Do not abbreviate. Use full name.) 23RD LEGISLATIVE DISTRICT REPUBLICAN COMMITTEE			
Mailing Address 2916 NW Bucklin Hill Rd #175			
City Silverdale, WA	Zip + 4 98383	Office Sought (candidates)	Election Date 2020

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
09/30/20	e. Small contributions \$25.00 or less not itemized and number of persons giving <u>1</u> (persons)	\$0.05	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: * Employer's Name, City and State	P R I	G E N	Amount	Aggregate * Total
3/29/20	PROCEEDS FROM LOW COST <i>1st KCRP</i>				\$480.00	\$0.00
	Occupation					
1/01/20	PROCEEDS FROM LOW COST <i>Stellar \$1,000</i>				\$280.00	\$0.00
	Occupation					
1/02/20	PROCEEDS FROM LOW COST <i>Walmart Poughon \$800</i>				\$490.00	\$0.00
	Occupation					
1/09/20	PROCEEDS FROM LOW COST <i>Walmart Poughon \$1,000</i>				\$590.00	\$0.00
	Occupation					
1/15/20	PROCEEDS FROM LOW COST <i>Wigston \$800</i>				\$480.00	\$0.00
	Occupation					
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			\$2,320.05	*See reverse for details.
		Amount from attached pages			\$880.00	
TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.					\$3,200.05	

4. Date of Deposit 10/02/20 Treasurer's Daytime Telephone No.: (360) 620-1255	I certify that this report is true and complete to the best of my knowledge	
	Treasurer's Signature David Lindquist	Date 10-02-2020

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

Candidate or Committee Name (Do not abbreviate. Use full name.)
23RD LEGISLATIVE DISTRICT REPUBLICAN COMMITTEE

Deposit Date
10/02/20

CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
09/18/20	PROCEEDS FROM LOW COST \$147.00 <i>Rainbridge Dinner</i>				\$320.00	\$0.00
09/11/20	PROCEEDS FROM LOW COST <i>Wagon</i>				\$560.00	\$0.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				


Page Total \$880.00

11/4/2020

Re: PDC - Request personal financial statements - pamela madden-boyer - pammadboy@gmail.com - Gmail

Ferguson April D_F1 rcvd 6.24.2019. Open with

*CANDIDATES: Do not use public agency addresses or telephone contact information.

PUBLIC DISCLOSURE COMMISSION
 711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-601-2828
EMAIL: pdc@dc.wa.gov

PROVIDE INFORMATION FOR YOURSELF, SPOUSE, REGISTERED DOMESTIC PARTNER, OR YOUR HOUSEHOLD

Last Name	First
FERGUSON	APRIL

A

OFFICE HELD, BUSINESS INTERESTS:

Provide the following information for each dependent:

- (1) were an officer, organization, union, or association
- (2) were a partner, proprietorship, or similar entity, including a sole proprietorship

- Legal Name: Report name used or
- Trade or Operating Name: Report
- Position or Percent of Ownership:
- Brief Description of the Business/O
- Payments from Governmental Unit entity concerning which you're rep
- Payments from Business Custom proprietorship, union, association, seek/hold office) which paid comp services or other consideration was
- Washington Real Estate: Identify n

ENTITY NO. 1

LEGAL NAME:

Safe and Sound Electric

TRADE OR OPERATING NAME:

Safe and Sound Electric

ADDRESS:

6482 NE Fir St

Suquamish

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

Electrical contractor

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT
Purpose of payments

ENTITY RECEIVED FROM OTHER GOVERNMENTAL UNIT
Agency name:

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828		PDC FORM <div style="font-size: 2em; font-weight: bold;">F-1</div> (1/15)	PERSONAL FINANCIAL AFFAIRS STATEMENT		PDC OFFICE USE 100912098 Covers: 6-24-2018: To: 6-24-2019 Received: 06-24-2019											
Refer to instruction manual for detailed assistance and examples. Deadlines: Incumbent elected and appointed officials -- by April 15. Candidates and others -- within two weeks of becoming a candidate or being newly appointed to a position.			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">DOLLAR CODE</th> <th style="text-align: left;">AMOUNT</th> </tr> <tr> <td>A</td> <td>\$1 to \$4,499</td> </tr> <tr> <td>B</td> <td>\$4,500 to \$23,999</td> </tr> <tr> <td>C</td> <td>\$24,000 to \$47,999</td> </tr> <tr> <td>D</td> <td>\$48,000 to 119,999</td> </tr> <tr> <td>E</td> <td>\$120,000 or more</td> </tr> </table>		DOLLAR CODE	AMOUNT	A	\$1 to \$4,499	B	\$4,500 to \$23,999	C	\$24,000 to \$47,999	D	\$48,000 to 119,999	E	\$120,000 or more
DOLLAR CODE	AMOUNT															
A	\$1 to \$4,499															
B	\$4,500 to \$23,999															
C	\$24,000 to \$47,999															
D	\$48,000 to 119,999															
E	\$120,000 or more															
SEND REPORT TO PUBLIC DISCLOSURE COMMISSION <table style="width: 100%;"> <tr> <td style="width: 33%;">Last Name FERGUSON</td> <td style="width: 33%;">First APRIL</td> <td style="width: 33%;">Middle Initial D</td> </tr> </table>			Last Name FERGUSON	First APRIL	Middle Initial D	Names of immediate family members, including registered domestic partner. If there is no reportable information to disclose for dependent children, or other dependents living in your household, do not identify them. Do identify your spouse or registered domestic partner. See F-1 manual for details. Chadwick Ferguson SP										
Last Name FERGUSON	First APRIL	Middle Initial D														
Mailing Address (Use PO Box or Work Address) 6482 NE FIR ST <table style="width: 100%;"> <tr> <td style="width: 33%;">City SUQUAMISH</td> <td style="width: 33%;">County KITSAP</td> <td style="width: 33%;">Zip + 4 98392</td> </tr> </table>			City SUQUAMISH	County KITSAP	Zip + 4 98392	Office Held or Sought Office title: SCHOOL DIRECTOR County, city, district or agency of the office, name and number: NORTH KITSAP SD 400 Position number: 3 Term begins: 12-01-2019 ends: 11-30-2020										
City SUQUAMISH	County KITSAP	Zip + 4 98392														
Filing Status (Check only one box.) <input type="checkbox"/> An elected or state appointed official filing annual report <input type="checkbox"/> Final report as an elected official. Term expired: _____ <input checked="" type="checkbox"/> Candidate running in an election: month NOV year 2019 <input type="checkbox"/> Newly appointed to an elective office <input type="checkbox"/> Newly appointed to a state appointive office <input type="checkbox"/> Professional staff of the Governor's Office and the Legislature																

1

INCOME List each employer, or other source of income (pension, social security, legal judgment, etc.) from which you or a family member, including registered domestic partner, received \$2,400 or more during the period. Include stock options received during the reporting period that had a value of \$2,400 or more. (Report interest and dividends in Item 3 on reverse)

Show Self (S) Spouse (SP/DP) Dependent (D)	Name and Address of Employer or Source of Compensation	Occupation or How Compensation Was Earned	Amount: (Use Code)
SP	Safe and Sound Electric 6482 NE Fir St SUQUAMISH WA 98392	Electrician	

Check Here ☐ if continued on attached sheet

2

REAL ESTATE List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$12,000 in which you or a family member, including registered domestic partner, held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)

Property Sold or Interest Divested	Assessed Value (Use Code)	Name and Address of Purchaser	Nature and Amount (Use Code) of Payment or Consideration Received								
Property Purchased or Interest Acquired		Creditor's Name/Address	<table style="width: 100%;"> <tr> <th style="width: 50%;">Payment Terms</th> <th style="width: 50%;">Security Given</th> </tr> <tr> <td></td> <td> <table style="width: 100%;"> <tr> <th style="width: 50%;">Mortgage Amount - (Use Code)</th> <th style="width: 50%;">Original</th> </tr> <tr> <td></td> <td>Current</td> </tr> </table> </td> </tr> </table>	Payment Terms	Security Given		<table style="width: 100%;"> <tr> <th style="width: 50%;">Mortgage Amount - (Use Code)</th> <th style="width: 50%;">Original</th> </tr> <tr> <td></td> <td>Current</td> </tr> </table>	Mortgage Amount - (Use Code)	Original		Current
Payment Terms	Security Given										
	<table style="width: 100%;"> <tr> <th style="width: 50%;">Mortgage Amount - (Use Code)</th> <th style="width: 50%;">Original</th> </tr> <tr> <td></td> <td>Current</td> </tr> </table>	Mortgage Amount - (Use Code)	Original		Current						
Mortgage Amount - (Use Code)	Original										
	Current										
All Other Property Entirely or Partially Owned 6482 NE FIR STREET SUQUAMISH WA 98392 Check here <input type="checkbox"/> if continued on attached sheet	E	Chase WA	<table style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;">1,200 MONTHLY</td> <td style="width: 50%; text-align: center;"> E 0 </td> </tr> </table>	1,200 MONTHLY	E 0						
1,200 MONTHLY	E 0										

3

ASSETS / INVESTMENTS - INTEREST / DIVIDENDS

List bank and savings accounts, insurance policies, stock, bonds and other intangible property (including but not limited to stock options) held during the reporting period.

A. Name and address of each bank or financial institution in which you or a family member, including registered domestic partner, had an account over \$24,000 any time during the report period.	Type of Account or Description of Asset	Asset Value (Use Code)	Income Amount (Use Code)
B. Name and address of each insurance company where you or a family member, including registered domestic partner had a policy with a cash or loan value over \$24,000 during the period.			
C. Name and address of each company, association, government agency, etc. in which you or a family member, including registered domestic partner, owned or had a financial interest worth over \$2,400. Include stocks, bonds, ownership, retirement plan, IRA, notes, stock options, and other intangible property. If you, your spouse, registered domestic partner and/or dependents had decision making authority regarding individual assets/investments list each asset or investment, the value and any income amount. EXAMPLE: If you self directed an investment sale of common stock and sold it for \$24,000, list it as follows: 6482 NE Fir St Suquamish WA 98392	None	A	D

Check here ☐ if continued on attached sheet.

4

CREDITORS

List each creditor you or a family member, including registered domestic partner, owed \$2,400 or more any time during the period. Don't include retail charge accounts, credit cards, or mortgages or real estate reported in Item 2.

AMOUNT (USE CODE)

Creditor's Name and Address	Terms of Payment	Security Given	Original	Present
Dynamic Collectors 6482 NE Fir St Suquamish WA 98392	Monthly		B	B
Saba and Associates 6482 NE Fir St Suquamish WA 98392	none		B	B

Check here ☐ if continued on attached sheet.

5

All filers answer questions A thru D below. If the answer is YES to any of these questions, the F-1 Supplement must also be completed as part of this report. If all answers are NO and you are a candidate for state or local office, an appointee to a vacant elective office, or a state executive officer filing your initial report, no F-1 Supplement is required.

Incumbent elected officials and state executive officers filing an annual financial affairs report also must answer question E. An F-1 Supplement is required of these officeholders unless all answers to questions A thru E are NO.

- A. At any time during the reporting period were you, your spouse, registered domestic partner or dependents (1) an officer, director, general partner or trustee of any corporation, company, union, association, joint venture or other entity or (2) a partner or member of any limited partnership, limited liability partnership, limited liability company or similar entity including but not limited to a professional limited liability company? X If yes, complete Supplement, Part A.
- B. Did you, your spouse, registered domestic partner or dependents have an ownership of 10% or more in any company, corporation, partnership, joint venture or other business at any time during the reporting period? X If yes, complete Supplement, Part A.
- C. Did you, your spouse, registered domestic partner or dependents own a business at any time during the reporting period? X If yes, complete Supplement, Part A.
- D. Did you, your spouse, registered domestic partner or dependents prepare, promote or oppose state legislation, rules, rates or standards for current or deferred compensation (other than pay for a currently-held public office) at any time during the reporting period? If yes, complete Supplement, Part B.
- E. **Only for Persons Filing Annual Report.** Regarding the receipt of items not provided or paid for by your governmental agency during the previous calendar year: 1) Did you, your spouse, registered domestic partner or dependents (or any combination thereof) accept a gift of food or beverages costing over \$50 per occasion? or 2) Did any source other than your governmental agency provide or pay in whole or in part for you, your spouse, registered domestic partner and/or dependents to travel or to attend a seminar or other training? If yes to either or both questions, complete Supplement, Part C.

ALL FILERS EXCEPT CANDIDATES. Check the appropriate box.

- ☐ I hold a state elected office, am an executive state officer or professional staff. I have read and am familiar with RCW 42.52.180 regarding the use of public resources in campaigns.
- ☐ I hold a local elected office. I have read and am familiar with RCW 42.17A.555 regarding the use of public facilities in campaigns.

*CANDIDATES: Do not use public agency addresses or telephone numbers for contact information.

CERTIFICATION: I certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.

April Ferguson 06-24-2019
Signature Date

Contact Telephone: 360-621-3405 *

Email: aprilforthewin@gmail.com (work)*

Email: (Home) Optional

REPORT NOT ACCEPTABLE WITHOUT FILER'S SIGNATURE

PROVIDE INFORMATION FOR YOURSELF, SPOUSE, REGISTERED DOMESTIC PARTNER, DEPENDENT CHILDREN AND OTHER DEPENDENTS IN YOUR HOUSEHOLD

Last Name	First	Middle Initial	DATE
FERGUSON	APRIL	D	2019-06-24

A

OFFICE HELD, BUSINESS INTERESTS:

Provide the following information if, during the reporting period, you, your spouse, registered domestic partner or dependents

- (1) were an officer, director, general partner, trustee, or 10 percent or more owner of a corporation, non-profit organization, union, partnership, joint venture or other entity; and/or
- (2) were a partner or member of a limited partnership, limited liability partnership, limited liability company or similar entity, including but not limited to a professional limited liability company.

- Legal Name: Report name used on legal documents establishing the entity.
- Trade or Operating Name: Report name used for business purposes if different from the legal name.
- Position or Percent of Ownership: The office, title and/or percent of ownership held.
- Brief Description of the Business/Organization: Report the purpose, product(s), and/or the service(s) rendered.
- Payments from Governmental Unit: If the governmental unit in which you hold or seek office made payments to the business entity concerning which you're reporting, show the purpose of each payment and the actual amount received.
- Payments from Business Customers and Other Government Agencies: List each corporation, partnership, joint venture, sole proprietorship, union, association, business or other commercial entity and each government agency (other than the one you seek/hold office) which paid compensation of \$12,000 or more during the period to the entity. Briefly say what property, goods, services or other consideration was given or performed for the compensation.
- Washington Real Estate: Identify real estate owned by the business entity if the qualifications referenced below are met.

ENTITY NO. 1

Reporting For: Self ☐ Spouse ☒

Registered Domestic Partner ☐ Dependent ☐

LEGAL NAME:

Safe and Sound Electric

TRADE OR OPERATING NAME:

Safe and Sound Electric

ADDRESS:

6482 NE Fir St

Suquamish

WA 98392

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

Electrical contractor

POSITION OR PERCENT OF OWNERSHIP
owner

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:

Purpose of payments

Amount (actual dollars)
\$

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:

Agency name:

Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE

Customer name:

Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here ☐ if continued on attached sheet

CONTINUE PARTS B AND C ON NEXT PAGES

[Return to Search Results](#)

You searched for: ParcelID = 43870100130009

28 items found, displaying all items.1

Description	Summary	Add All to My Images
Notice Trustee Sale 201912180251	Rec Date: 12/18/2019 02:13:49 PM BookPage: Related: 200912300162 Number Pages: 4 Grantor: FERGUNSON CHADWICK, FERGUNSON APRIL Grantee: WILMINGTON SAVINGS FUND SOCIETY, WILMINGTON SAVINGS FUND SOCIETY FSB, QUERCUS MORTGAGE INVESTMENT TRUST, ... Remarks: Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel:	View Image Add to My Images
Notice Trustee Sale 201912170199	Rec Date: 12/17/2019 02:30:40 PM BookPage: Related: 200912300162, 201912160113 Number Pages: 4 Grantor: FERGUNSON CHADWICK, FERGUNSON APRIL Grantee: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC, METLIFE HOME LOANS, METLIFE BANK NA, ... Remarks: , ... Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel:	View Image Add to My Images
Deed Of Trust 200912300162	Rec Date: 12/30/2009 01:36:10 PM BookPage: Related: Number Pages: 9 Grantor: FERGUSON APRIL, FERGUSON CHADWICK Grantee: FIRST AMERICAN TITLE INS, METLIFE HOME LOANS Remarks: Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Parcel:	View Image Add to My Images
Assignment Of Deed Trust 201912160113	Rec Date: 12/16/2019 09:58:41 AM BookPage: Related: 201911220009, 200912300162 Number Pages: 2 Grantor: FERGUSON APRIL, FERGUNSON CHADWICK, JPMORGAN CHASE BANK NATIONAL ASSOCIATION Grantee: WILMINGTON SAVINGS FUND SOCIETY FSB, QUERCUS MORTGAGE Remarks: , ... Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Parcel: , Parcel: BLA PAR C AFN 200705080430	View Image Add to My Images

Description	Summary	Add All to My Images
Lien 201209110086	<p>Rec Date: 09/11/2012 10:26:04 AM BookPage: Related: Number Pages: 1</p> <p>Grantor: FERGUSON CHAD Grantee: PUBLIC WORKS KITSAP COUNTY</p> <p>Remarks: Legal: Subdivision SUQUAMISH 1ST ADDN Parcel: 43870100130009 , Parcel:</p>	No images
Lien 201103070389	<p>Rec Date: 03/07/2011 03:23:57 PM BookPage: Related: Number Pages: 1</p> <p>Grantor: FERGUSON CHAD Grantee: PUBLIC WORKS KITSAP COUNTY</p> <p>Remarks: Legal: Parcel: 43870100130009 , Parcel:</p>	No images
Lien 201809170073	<p>Rec Date: 09/17/2018 08:22:15 AM BookPage: Related: Number Pages: 1</p> <p>Grantor: FERGUSON CHAD Grantee: KITSAP COUNTY PUBLIC WORKS</p> <p>Remarks: , ... Legal: Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel: 43870100130009</p>	No images
Deed Of Trust 200908270151	<p>Rec Date: 08/27/2009 02:57:07 PM BookPage: Related: Number Pages: 8</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL Grantee: FLAGSTAR BANK, TMBG</p> <p>Remarks: Legal: Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: ..., Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel:</p>	View Image Add to My Images
Deed Of Trust 200908270189	<p>Rec Date: 08/27/2009 04:33:42 PM BookPage: Related: 200908270151 Number Pages: 6</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL Grantee: KITSAP COUNTY CONSOL HOUSING AUTHORITY, PACIFIC NW TITLE</p> <p>Remarks: Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Sixteenth: SW Quarter: NW Section: 21 Township: 26 Range..., Parcel:</p>	View Image Add to My Images
Modification Agmt 201606230026	<p>Rec Date: 06/23/2016 09:10:24 AM BookPage: Related: 200912300162 Number Pages: 11</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL Grantee: JPMORGAN CHASE BANK, N.A.</p> <p>Remarks: Legal: Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: ...</p>	View Image Add to My Images
Modification Agmt 201311190047	<p>Rec Date: 11/19/2013 11:29:36 AM BookPage: Related: 200912300162 Number Pages: 11</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL Grantee: JPMORGAN CHASE BANK NA</p> <p>Remarks: Legal: Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: ...</p>	View Image Add to My Images

Description	Summary	Add All to My Images
Subordination Agmt 201311190048	<p>Rec Date: 11/19/2013 11:29:36 AM BookPage: Related: 200912300162 Number Pages: 5</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL</p> <p>Grantee: SECRETARY OF HOUSING AND URBAN DEVELOPMENT, HOUSING AND URBAN DEVELOPMENT SECRETARY OF</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009</p>	View Image Add to My Images
Assignment Of Deed Trust 202002060138	<p>Rec Date: 02/06/2020 12:35:39 PM BookPage: Related: 201911220009, 200912300162 Number Pages: 2</p> <p>Grantor: FERGUSON CHADWICK, JPMORGAN CHASE BANK NATIONAL ASSOCIATION, FERGUSON APRIL</p> <p>Grantee: WILMINGTON SAVINGS FUND SOCIETY FSB, QUERCUS MORTGAGE INVESTMENT TRUST</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel:</p>	View Image Add to My Images
Judgement 201901290036	<p>Rec Date: 01/29/2019 09:07:58 AM BookPage: Related: Number Pages: 9</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL, STANDLEY MARTHA, ...</p> <p>Grantee: WALSH JACK, WALSH MARILYN, FERGUSON CHADWICK, ...</p> <p>Remarks: , ...</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel:</p>	View Image Add to My Images
Modification Agmt 201903180001	<p>Rec Date: 03/18/2019 08:04:11 AM BookPage: Related: 200912300162 Number Pages: 11</p> <p>Grantor: FERGUSON CHADWICK, FERGUSON APRIL</p> <p>Grantee: JPMORGAN CHASE BANK NA</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel:</p>	View Image Add to My Images
Partial Reconveyance 201208230008	<p>Rec Date: 08/23/2012 08:29:21 AM BookPage: Related: 200810090034 Number Pages: 2</p> <p>Grantor: FIRST AMERICAN TITLE INS</p> <p>Grantee:</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100100101 , Parcel: 43870100110001 , Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 10 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 11 Block 10 Parcel:</p>	View Image Add to My Images

Description	Summary	Add All to My Images	
Assignment Of Deed Trust 201911220009	<p>Rec Date: 11/22/2019 09:05:44 AM BookPage: Related: 200912300162 Number Pages: 2</p> <p>Grantor: JPMORGAN CHASE BANK NATIONAL ASSOCIATION, FERGUSON CHADWICK, FERGUSON APRIL</p> <p>Grantee: WILMINGTON SAVINGS FUND SOCIETY FSB, QUERCUS MORTGAGE INVESTMENT TRUST, CARRINGTON MORTGAGE SERVICES</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel: , Parcel:</p>	View Image Add to My Images	
Appointment Of Trustee 201502020103	<p>Rec Date: 02/02/2015 02:06:27 PM BookPage: Related: 200912300162 Number Pages: 2</p> <p>Grantor: JPMORGAN CHASE BANK, NATIONAL ASSOCIATION</p> <p>Grantee: QUALITY LOAN SERVICE CORPORATION OF WASHINGTON</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel:</p>	View Image Add to My Images	
Deed Of Trust 200705290194	<p>Rec Date: 05/29/2007 02:54:21 PM BookPage: Related: Number Pages: 9</p> <p>Grantor: KEATING BUILDERS</p> <p>Grantee: PEOPLES BANK, LAND TITLE CO</p> <p>Remarks:</p> <p>Legal: Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: ..., Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel: , Parcel: 43870100130009</p>	View Image Add to My Images	
Deed 200908270150	<p>Rec Date: 08/27/2009 02:57:07 PM Excise#: 0904634 BookPage: Related: Number Pages: 3</p> <p>Grantor: KEATING BUILDERS</p> <p>Grantee: FERGUSON CHADWICK, FERGUSON APRIL</p> <p>Remarks: , ...</p> <p>Legal: Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: ..., ...</p>	View Image Add to My Images	
Lien 200903100094	<p>Rec Date: 03/10/2009 10:31:22 AM BookPage: Related: Number Pages: 1</p> <p>Grantor: KEATING BUILDERS</p> <p>Grantee: PUBLIC WORKS KITSAP COUNTY</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009</p>	No images	
Notice Trustee Sale 201504160002	<p>Rec Date: 04/16/2015 08:01:44 AM BookPage: Related: 200912300162 Number Pages: 4</p> <p>Grantor: QUALITY LOAN SERVICE CORP. OF WASHINGTON</p> <p>Grantee: FERGUSON CHADWICK, FERGUSON APRIL, MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., ...</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Parcel:</p>	View Image Add to My Images	

Description	Summary	Add All to My Images
Notice Trustee Sale 201511050097	<p>Rec Date: 11/05/2015 12:37:17 PM BookPage: Related: 200912300162, 201311190047 Number Pages: 4</p> <p>Grantor: QUALITY LOAN SERVICE CORP. OF WASHINGTON</p> <p>Grantee: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., FERGUSON CHADWICK, FERGUSON APRIL, ...</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Parcel: , Parcel:</p>	<p>View Image</p> <p>Add to My Images</p>
Notice Discontinuance Of Trustee Sale 201601220181	<p>Rec Date: 01/22/2016 03:34:38 PM BookPage: Related: 200912300162, 201311190047, 201511050097 Number Pages: 2</p> <p>Grantor: QUALITY LOAN SERVICE CORPORATION OF WASHINGTON</p> <p>Grantee: FERGUSON CHADWICK, FERGUSON APRIL, MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., ...</p> <p>Remarks:</p> <p>Legal: Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: ..., Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Parcel:</p>	<p>View Image</p> <p>Add to My Images</p>
Notice Discontinuance Of Trustee Sale 201509170159	<p>Rec Date: 09/17/2015 03:08:38 PM BookPage: Related: 201311190047, 201504160002, 200912300162 Number Pages: 2</p> <p>Grantor: QUALITY LOAN SERVICE CORPORATION OF WASHINGTON</p> <p>Grantee: FERGUSON CHADWICK, FERGUSON APRIL, MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., ...</p> <p>Remarks:</p> <p>Legal: Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: ..., Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Parcel:</p>	<p>View Image</p> <p>Add to My Images</p>
Notice Discontinuance Of Trustee Sale 201912180149	<p>Rec Date: 12/18/2019 11:01:09 AM BookPage: Related: 200912300162, 201912170199 Number Pages: 2</p> <p>Grantor: QUALITY LOAN SERVICE CORPORATION OF WASHINGTON</p> <p>Grantee: FERGUNSON CHADWICK, FERGUSON APRIL, MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC, ...</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel:</p>	<p>View Image</p> <p>Add to My Images</p>
Notice Trustee Sale 201212130281	<p>Rec Date: 12/13/2012 03:17:44 PM BookPage: Related: 200912300162 Number Pages: 4</p> <p>Grantor: QUALITY LOAN SRVC CORP OF WA</p> <p>Grantee: METLIFE HOME LOANS, FERGUSON CHADWICK, FERGUSON APRIL</p> <p>Remarks:</p> <p>Legal: Parcel: 43870100130009 , Subdivision SUQUAMISH 1ST ADDN Lot 14 Block 10 Parcel: , Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , Parcel:</p>	<p>View Image</p> <p>Add to My Images</p>

Description	Summary	Add All to My Images
Deed 200705290193	Rec Date: 05/29/2007 02:54:21 PM Excise#: 0703918 BookPage: Related: Number Pages: 1 Grantor: TRAN HA N Remarks:	View Image Add to My Images
	Grantee: KEATING BUILDERS Legal: Subdivision SUQUAMISH 1ST ADDN Lot 13 Block 10 Parcel: , ...	

28 items found, displaying all items.1

[Return to Search Results](#)

Party Search Results

Name



Date of Birth



FERGUSON, APRIL

[Cases \(1\)](#)

Cases

15-2-02579-3

File Date	Type	Location
12/31/2015	PIN Personal Injury	Kitsap

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

14-2-00947-1

File Date	Type	Location
05/20/2014	COM Commercial	Kitsap

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

16-2-00144-3

File Date	Type	Location
02/26/2016	PIN Personal Injury	Clallam

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

14-2-50999-7

File Date	Type	Location
09/26/2014	Tax Warrants	Kitsap

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

18-2-00094-18

File Date	Type	Location
01/10/2018	PIN Personal Injury	Kitsap

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

18-2-01513-34

File Date	Type	Location
03/20/2018	PRA Public Records Act	Thurston

FERGUSON, APRIL

[Cases \(1\)](#)

Cases

20-2-00157-18

File Date	Type	Location
01/22/2020	COL Collection	Kitsap

FERGUSON, APRIL D

[Cases \(1\)](#)

Cases

13-2-00173-1

File Date	Type	Location
01/23/2013	COM Commercial	Kitsap

FERGUSON, APRIL DAWN

[Cases \(1\)](#)

Cases

19-2-01592-18

File Date	Type	Location
06/03/2019	TAX Revenue Tax Warrant	Kitsap

FERGUSON, APRIL DAWN

Cases (1)

Cases

19-2-03276-18

File Date	Type	Location
11/27/2019	TAX L & I Tax Warrant	Kitsap

1 - 10 of 11 items

Name and Mailing Address

BELL & DAVIS PLLC

PO BOX 510

SEQUIM, WA 98382

The Recorder is required to use only the information
you provide on this cover sheet to index the document.

Type or print legibly.

Document Title(s): JUDGMENT ORDER

Auditor's File Number of Document (s) Referenced:

Grantor(s) person(s) that conveys, sells or grants interest in property:

FERGUSON, CHADWICK & APRIL

Grantee(s) person that buys, receives or to whom conveyance of property is made:

WALSH, JACK & MARILYN

Abbreviated Legal Description:

- Quarter, Quarter, Section, Township, Range (and Government lot # if applicable); OR
- Plat/Condo Name, lot or unit number, building or block number; OR
- Short Plat, Large Lot number, lot number and auditor file number

LOT 14 & PTN LOT 13 BLK 10 IST ADD TO SUQUAMISH V/P 4/42

Assessor's 14 digit Tax Parcel Number: 4387-010-013-0009

04/25/14

16

Exhibit 1
Page 26 of 44

201201230000 01/23/2012 09:07:00 AM Page 3 of 3

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II. SUMMARY JUDGMENT

This matter having come on for the hearing on September 16, 2016 upon Marilyn and Jack Walsh's Motion for Summary Judgment Dismissing Defendant Walsh; Plaintiffs appeared pro se with April Ferguson appearing in person, Defendants Marilyn Walsh and Jack Walsh appeared in person and through their counsel, W. Jeff Davis, of BELL & DAVIS PLLC; the court having reviewed the records and files herein including:

- A. Motion for Summary Judgment Dismissing Defendant Walsh;
- B. Declaration of Marilyn Walsh in Support of Walsh' Motion for Summary Judgment;
- C. Declaration of W. Jeff Davis in Support of Award of Attorneys' Fees and Costs as Part of Walsh' Motion for Summary Judgment ;
- D. Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment;
- E. April Ferguson's Affidavit in Support of Opposition to Walsh's Motion for Summary Judgment;
- F. Chadwick Ferguson's Affidavit in Support of Opposition to Walsh's Motion for Summary Judgment;
- G. Plaintiff's Exhibits 1 - 20;
- H. Plaintiff's Exhibits 21 - 32;
- I. Plaintiffs' Motion for Continuance of Walsh's Motion for Summary Judgment CR 56(f);
- J. April Ferguson's Affidavit in Support of Plaintiff's Motion for

ORDER GRANTING DEFENDANT WALSH' MOTION
FOR SUMMARY JUDGMENT AND DENYING
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Continuance of Walsh's Motion for Summary Judgment CR 56(f);

K. Defendant Walsh's Objections and Motion to Strike Portions of Plaintiffs' Affidavits in Support of Opposition to Walsh's Motion for Summary Judgment and Exhibits;

L. Walsh' Reply to Plaintiffs' Response to Motion for Summary Judgment Dismissing Defendant Walsh;

M. Supplemental Declaration of Marilyn Walsh in Support of Walsh' Motion for Summary Judgment;

N. Walsh' Response in Opposition to Plaintiffs' Motion to Continue Summary Judgment CR 56(f);

O. Supplemental Declaration of W. Jeff Davis re: Attorney Fees;

P. Plaintiff's Rebuttal and Supplemental Affidavit in Support of Motion for Continuance of Walsh's Motion for Summary Judgment;

Q. Declaration of Gary A. Preble;

and hearing argument from counsel and April Ferguson, HEREBY FINDS, that:

1. Proper notice of this hearing was provided to Plaintiffs;

2. Plaintiffs have not shown a reasonable basis for not having provided responsive declarations as they suggest they need. There is no showing the witnesses were not available to provide timely affidavits or declaration. Additionally, the information sought by Plaintiffs through their proposed discovery will not raise a material issue of fact in that such information will not establish a breach of the lease, constructive eviction, breach of quiet enjoyment, unjust enrichment, abuse of process, civil conspiracy, negligence/gross negligence,

ORDER GRANTING DEFENDANT WALSH' MOTION
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of 7

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1 defamation, tortious interference with contractual expectancy, civil conspiracy or
2 violations of the 1st, 4th and 14th amendments;

3 3. There are no material issues of fact and Defendant Walsh is entitled to
4 judgment as a matter of law. There is no just reason for delay in entering judgment
5 dismissing Walsh as a Defendant in this action. There are simply no facts
6 presented by Plaintiffs, even viewed most favorably for them, that support any of
7 their claims against Walsh;
8

9 4. The delay in opening caused by the unexpected requirement to install
10 a fire suppression system in the building was not Walsh's fault and which condition
11 they quickly rectified. Even with this delay Plaintiffs chose to continue under the
12 lease and successfully opened their business which they operated for over two years
13 without complaint. Plaintiffs presented no evidence even suggesting Walsh failed
14 in their duty to maintain the building or parking lot or that anything they did, or
15 the building's condition constructively evicted Plaintiffs. Walsh's attempts to
16 collect rent did not amount to a constructive eviction or result in a breach of
17 Plaintiffs right to quiet enjoyment;
18

19 5. Plaintiffs work on the building getting it ready to open was not under
20 circumstances that unjustly enriched Walsh. Walsh paid for the work Plaintiffs
21 billed them for and the other work by Plaintiffs own records were done for free;
22

23 6. There was no abuse of process by Walsh serving Plaintiffs with a three
24 day notice to pay or vacate at a time Plaintiffs owed thousands of dollars in back
25 rent and unpaid utility charges. There was not a misuse of process but a legal
26 application of the unlawful detainer statute;

ORDER GRANTING DEFENDANT WALSH' MOTION
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1 7. Plaintiffs presented no evidence supporting any type of negligent claim
2 against Walsh. No proof was provided showing what duty Walsh owed Plaintiffs
3 that was breached with resulting causation and injury. Similarly, Plaintiffs
4 presented no evidence of any false or defamatory statement made by Walsh
5 supporting the claims of false light, invasion of privacy, or defamation;
6

7 8. Plaintiffs presented no evidence supporting their claim that Walsh
8 tortuously interfered with a contractual expectancy. Walsh cannot interfere with
9 their own contract with Plaintiffs. Further, simply fielding offers from other
10 persons regarding the building did not prove that Walsh interfered with Plaintiffs'
11 business or contractual expectancies;
12

13 9. Plaintiffs submitted no evidence that Walsh acted with any unlawful
14 purpose in seeking to remove Plaintiffs from the building for non-payment of rent
15 and utility bills. There was no proof provided supporting Plaintiffs' claim that
16 Walsh conspired with anyone against them. Plaintiffs provided nothing by either
17 affidavit or exhibits that show any specific actions by Walsh to conspire with others
18 to hurt Plaintiffs by some unlawful means. The Civil Conspiracy claim fails;
19

20 10. Regarding the allegations that Walsh violated Plaintiffs' 1st, 4th, and
21 14th amendment rights, Plaintiffs presented no evidence that Walsh ever
22 suppressed Plaintiffs right to free speech, right to due process, or right against
23 unlawful search or seizure;

24 11. Plaintiffs provided no proof that Walsh violated the Public Records
25 Act;

26 12. Defendant Walsh is entitled to an award of attorney's fees in the

ORDER GRANTING DEFENDANT WALSH' MOTION
FOR SUMMARY JUDGMENT AND DENYING
PLAINTIFFS' MOTION FOR CONTINUANCE, Page 5
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1 amount of \$11,000.00 and costs in the amount of \$142.754 against Plaintiffs. This
2 is based upon the fact that the entire action, when considered in its entirety, is
3 frivolous. As noted above there is no evidence supporting any of Plaintiffs' claims
4 against Walsh. Plaintiffs' action against Walsh cannot be supported by any rational
5 argument on the law or facts. RCW 4.84.185; and
6

7 13. Further, paragraph 25.1 of the Lease provides for an award of
8 attorney's fees against the defaulting party;

9 14. Walsh's counsel submitted two declarations supporting their
10 attorney's fee and cost requests. Counsel asserts he spent 42.90 hours working on
11 the case through September 12, 2016 and asked for an additional 6 hours preparing
12 for and attending the September 16, 2016 hearing. He also asked for recovery of his
13 assistant's time which totaled 13.45 hours and costs of \$142.75 of which \$132.50
14 was for changing the case venue from Kitsap to Clallam County;
15

16 15. Counsel has practiced law for over 34 years. His hourly rate of
17 \$230.00 is very reasonable in the Clallam County area for an attorney of his
18 experience. In reviewing the submitted time records, 47.83 hours of attorney time
19 is reasonable for the work required in defending this action involving a confusing,
20 voluminous complaint and in having to seek the change of venue, when the lease
21 between the parties clearly requires any suit between them be brought in Clallam
22 County.
23

24 III. JUDGMENT

25 Based upon the foregoing it is HEREBY ORDERED:

- 26 1. Plaintiff's motion for continuance is denied;

ORDER GRANTING DEFENDANT WALSH' MOTION
FOR SUMMARY JUDGMENT AND DENYING
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of 7

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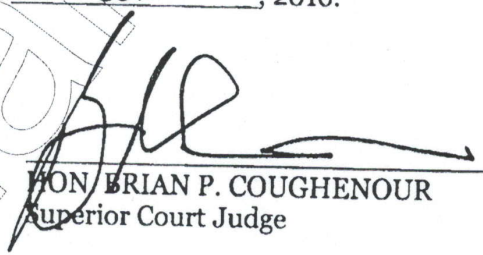
2. Defendant Walsh Motion for Summary Judgment is granted. There is no just reason for delay and this court directs entry of final judgment dismissing Plaintiffs' action against Walsh with prejudice. Plaintiffs' complaint and all of its causes of action contained therein as they apply to Defendant Walsh is dismissed with prejudice;

3. Defendant Walsh is awarded attorneys' fees against Chadwick Ferguson and April Ferguson, husband and wife, in the amount of \$11,000.00;

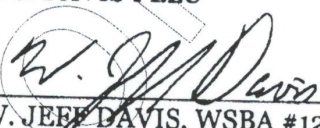
4. Defendant Walsh is awarded costs against Chadwick Ferguson and April Ferguson, husband and wife, in the amount of \$142.75.

5. Interest on the total judgment will accrue at 12% per annum.

DATED this 31st day of Oct, 2016.


HON. BRIAN P. COUGHENOUR
Superior Court Judge

Presented by:
BELL & DAVIS PLLC

By: 
W. JEFF DAVIS, WSBA #12246
Attorney for Marilyn and Jack Walsh,
Defendants

ORDER GRANTING DEFENDANT WALSH' MOTION
FOR SUMMARY JUDGMENT AND DENYING
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STATE OF WASHINGTON, ss
County of Clallam

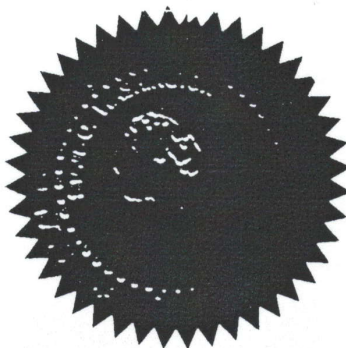
CERTIFICATE OF CLERK

I, Clallam County Clerk of said County and
ex-officio Clerk of Superior Court, do hereby certify
that the above and foregoing is a true and correct
transcript of the above entitled cause, as the same
appears on file in my office.

IN TESTIMONY WHEREOF, I have hereunto set my
hand and affixed the seal of said County this _____
day of _____ 20____

Clallam County Clerk

By _____ Deputy



it takes up more space
husband or middle name won
Exclude

16 names match your search criteria.

Name	Court	Case Number	Judgment Record	Court Information
1 Ferguson, April DEFENDANT	ST17 King Co Superior Ct	14-2-25592-6		09-17-2014
2 Ferguson, April Appellant	Coa, Division II	497239		12-01-2016
3 Ferguson, April Appellant	Coa, Division II	533308		04-08-2019
4 Ferguson, April Petitioner	Supreme Court	984609		04-24-2020
5 Ferguson, April Defendant	Kitsap District	20SC00157		10-07-2020
6 Ferguson, April A Defendant	Clark County Dist	331455-02		08-23-2010
7 Ferguson, April Dawn Petitioner	Kitsap District	Y14-03610		08-21-2014
8 Ferguson, April Dawn Petitioner	Kitsap District	Y14-03612		08-21-2014
9 Ferguson, April Dawn Defendant	Jefferson District	5Z1188611		12-01-2015
10 Ferguson, April Dawn Defendant	Kitsap District	6Z0930706		09-06-2016
11 Ferguson, April Dawn Defendant	Kitsap District	6Z1045975		10-12-2016
12 Ferguson, April Dawn Petitioner	Kitsap District	Y14-03611		08-21-2014
13 Ferguson, April Dawn Defendant	Kitsap District	6Z0703583		06-27-2016
14 Ferguson, April Dawn Defendant	Kitsap District	8Z0875342		08-20-2018
15 Ferguson, April Dawn Defendant	Kitsap District	9Z0638112		07-01-2019
16 Ferguson, April A Defendant	Island County Dist	CV09-0730		10-02-2009

Complaint & Judgement are all that's needed. If Judgment dismisses case than Complaint is irrelevant.

Respondent Name
23 rd Legislative District Republican Committee
Complainant Name
Elaina Gonzales-Blanton
Complaint Description
<p><u>Elaina</u> (Mon, 9 Nov 2020 at 9:56 PM)</p> <p>On Tuesday, November 3rd, I and Pam-Madden-Boyer met as agreed with 23rd Republicans LD and Chairwoman to perform a public inspection of committee financial records. During that time we were harassed, yelled at, and felt threatened by Chairwoman Ferguson because of her behaviors.</p> <p>We were not asked for our Identification however, Chairwoman Ferguson refused to allow a third party to take part even though she was made aware of the intention of this third-party to attend. Chairwoman Ferguson's behavior became so threatening that I called 911. I will send the PDC investigator a copy of that law enforcement report. Law enforcement told us to leave, and we did. The inspection occurred at 3pm and we did not get even 15 minutes.</p>
What impact does the alleged violation(s) have on the public?
The alleged violation prevented the public from being able to inspect the 23rd LD Republican's finances, therefore impacting campaign finance laws regarding transparency.
List of attached evidence or contact information where evidence may be found
<p>Emails between myself, April Ferguson, Pam Madden-Boyer, and Treasurer Lindquist (whom I am also filing a complaint against).</p> <p>Email from Kitsap County Republican Party Tony Stephens saying he would fix the books in response to my and Pam Madden-Boyer voicing our concerns that the records were not being kept in an accurate and timely manner.</p>
List of potential witnesses with contact information to reach them
Pamela-Madden Boyer
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.

Records inspection 23rd LD Republicans

A formal request to inspect the 23rd LD financials was made to the Treasurer, David Lindquist and Chairwoman, April Ferguson that included a list of financial documents needed for review. On Tuesday November 3rd 2020 PCO's (143), and (426) met with Chairwoman Ferguson and Treasurer Lindquist wherein only the bank statements were brought, and 2 receipts for the last 10 months. Mr. Lindquist was asked where the rest of the records were and he said "this is all April would let me have." April then was asked by the attending PCO's where the rest of the financial records were and instead of handing over the documents, she read RCW's to us and then told us that we were not entitled to what we had requested to see, and told us to file a PDC complaint.

Upon starting this inspection, PCO (143) declared that she would be recording the inspection to which April responded by saying it was illegal (it is not if the person being recorded is made aware and the parties agree and she was told), and demanded the recording stop, so the recording ceased.

PCO's (143) and (426) continued to ask April where the rest of the documents were and April got louder in her voice, stood up over the PCO's and continued to cite RCW's and saying that the PCO's were in violation. During this time, April's infant son was in his car seat, crying and April directed Treasurer Lindquist to care for her baby and give him a bottle.

Treasurer Lindquist did not participate in any of the 15 minutes, he cared for April's son. April controlled the entire meeting and became increasingly loud and combative, and agitated, causing PCO (143) to call 911. A sheriff deputy told PCO's (143) and (426) to leave and so we did.

The PDC was checked prior to this meeting and there was no report for the 09/18/2020 \$1,100 ticket sales however multiple reports were made after the meeting.

Re: Public Inspection of Committee Financial Records

From: april ferguson (aprilforthewin@gmail.com)

To: elainaluz@yahoo.com

Cc: pammadboy@gmail.com; Katiemadden2018@gmail.com; 1963dbl@gmail.com

Date: Monday, November 2, 2020, 04:43 PM PST

3:00 works

Sent from my iPhone

On Nov 2, 2020, at 4:32 PM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

Let's do 3 tomorrow afternoon. Please bring bank statements, and a document (whether hand written or typed) of first & last name / last 4 digits of debit card, Invoices and receipts.

Elaina Gonzales-Blanton

On Nov 2, 2020, at 8:26 AM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

Elaina Gonzales-Blanton

Begin forwarded message:

From: April Ferguson <aprilforthewin@gmail.com>
Date: November 2, 2020 at 7:03:54 AM PST
To: Elaina Gonzales <elainaluz@yahoo.com>
Subject: Re: Public Inspection of Committee Financial Records

This is to confirm 7:00 pm but I may be coming from an event so 7:30 would be better.

They can also be available anytime tomorrow prior to 5:00 pm. I do not have an up to date bank statement so if we want to include the month of October I will have to go get a bank statement and can do that if the inspection is allowed to happen tomorrow. I have not yet received any October statement.

April Ferguson

On Fri, Oct 30, 2020 at 10:06 AM Elaina Gonzales <elainaluz@yahoo.com> wrote:

April,
Please respond to my last email. At the last meeting they decided to not meet on this night because it's the night before the election. You proposed this night, so let's do it at 7.

11/9/2020

Yahoo Mail - Re: Public Inspection of Committee Financial Records

Thank you,

Elaina Gonzales-Blanton

On Oct 29, 2020, at 9:53 PM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

It's not. The meeting was moved out because of the election.

Elaina Gonzales-Blanton

On Oct 29, 2020, at 9:21 PM, April Ferguson <aprilforthewin@gmail.com> wrote:

I believe that is during the KCRP monthly meeting so we may have to do it after the meeting or prior to the meeting. Our treasurer works until 5:00 so probably better to do it after.

On Thu, Oct 29, 2020 at 9:15 PM Elaina Gonzales <elainaluz@yahoo.com> wrote:

Ok, how is 7?

Elaina Gonzales-Blanton

On Oct 29, 2020, at 3:28 PM, April Ferguson <aprilforthewin@gmail.com> wrote:

We will do November 2nd at KCRP headquarters. This will be in the evening hours if that works for you.

April Ferguson

On Thu, Oct 29, 2020 at 3:03 PM Elaina Gonzales <elainaluz@yahoo.com> wrote:

Hello,

This is a formal request from myself and Pam Madden-Boyer for the 23rd LD Committee Financial Records. As per PDC regulations, we are requesting a public inspection of the committee's financial records and this request must be honored.

We request that this viewing occur on Friday, October 30th, Sunday, November 1st, or Monday, November 2nd at KCRP Headquarters in Silverdale. Pam and I are available any time Friday, Sunday and Monday.

Please bring to this viewing the bank statements for the entire year of 2020.

11/9/2020

Yahoo Mail - Re: Public Inspection of Committee Financial Records

Thank you,

*Elaina Gonzales-Blanton, and
Pamela Madden-Boyer*

Re: Public Inspection of Committee Financial Records

From: Elaina Gonzales (elainaluz@yahoo.com)

To: pammadboy@gmail.com; Katiemadden2018@gmail.com; aprilforthewin@gmail.com; 1963dbl@gmail.com

Date: Monday, November 2, 2020, 04:32 PM PST

Let's do 3 tomorrow afternoon. Please bring bank statements, and a document (whether hand written or typed) of first & last name / last 4 digits of debit card, Invoices and receipts.

Elaina Gonzales-Blanton

On Nov 2, 2020, at 8:26 AM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

Elaina Gonzales-Blanton

Begin forwarded message:

From: April Ferguson <aprilforthewin@gmail.com>
Date: November 2, 2020 at 7:03:54 AM PST
To: Elaina Gonzales <elainaluz@yahoo.com>
Subject: Re: Public Inspection of Committee Financial Records

This is to confirm 7:00 pm but I may be coming from an event so 7:30 would be better.

They can also be available anytime tomorrow prior to 5:00 pm. I do not have an up to date bank statement so if we want to include the month of October I will have to go get a bank statement and can do that if the inspection is allowed to happen tomorrow. I have not yet received any October statement.

April Ferguson

On Fri, Oct 30, 2020 at 10:06 AM Elaina Gonzales <elainaluz@yahoo.com> wrote:

April,
Please respond to my last email. At the last meeting they decided to not meet on this night because it's the night before the election. You proposed this night, so let's do it at 7.

Thank you,

Elaina Gonzales-Blanton

On Oct 29, 2020, at 9:53 PM, Elaina Gonzales <elainaluz@yahoo.com> wrote:

It's not. The meeting was moved out because of the election.

Elaina Gonzales-Blanton

On Oct 29, 2020, at 9:21 PM, April Ferguson
<aprilforthewin@gmail.com> wrote:

I believe that is during the KCRP monthly meeting so we may have to do it after the meeting or prior to the meeting. Our treasurer works until 5:00 so probably better to do it after.

On Thu, Oct 29, 2020 at 9:15 PM Elaina Gonzales
<elainaluz@yahoo.com> wrote:
Ok, how is 7?

Elaina Gonzales-Blanton

On Oct 29, 2020, at 3:28 PM, April Ferguson
<aprilforthewin@gmail.com> wrote:

We will do November 2nd at KCRP headquarters. This will be in the evening hours if that works for you.

April Ferguson

On Thu, Oct 29, 2020 at 3:03 PM Elaina Gonzales <elainaluz@yahoo.com> wrote:

Hello,

This is a formal request from myself and Pam Madden-Boyer for the 23rd LD Committee Financial Records. As per PDC regulations, we are requesting a public inspection of the committee's financial records and this request must be honored.

We request that this viewing occur on Friday, October 30th, Sunday, November 1st, or Monday, November 2nd at KCRP Headquarters in Silverdale. Pam and I are available any time Friday, Sunday and Monday.

Please bring to this viewing the bank statements for the entire year of 2020.

11/9/2020

Yahoo Mail - Re: Public Inspection of Committee Financial Records

Thank you,

Elaina Gonzales-Blanton, and Pamela Madden-Boyer

23rd LD circular firing squad and other matters.

From: Tony Stephens (kcrpchair@gmail.com)

To: kcrpchair@gmail.com

Bcc: elainaluz@yahoo.com

Date: Monday, October 12, 2020, 05:37 PM PDT

Conservatives Caucus,

As we approach the election and the OM, it is time for cool heads: those who can do their duty on behalf of the team to achieve larger, more important goals than those seemingly important things just in front of us. How we begin will define what we achieve.

We have a Conservative Caucus of people who wish to ensure the Kitsap County Republican Party succeeds in defending our principles. There are a lot of new people to help us with that.

These new people are not interested in drama, and quite frankly drama is the death-knell of an organization. If control over some portion of an organization is the reason for the drama, it becomes a self-defeating scheme. The sort of drama we have been hearing is the exact type which destroys an organization, making it not worth the winning. Of course, no one ever wins in this sort of game, anyway. Everyone loses.

I have heard the 23rd LD Treasury is not properly managed or accounted for, if one looks at the PDC. We are used to a high degree of specificity in PDC accounting, but this is not the norm. I will assist the new 23rd Treasurer to fix the books. This is not a reason for drama. No money has been stolen. The PDC is easy to work with and we can fix any problems.

I have heard that April has fallen under the sphere of JT Wilcox. I may have been the source for this one, but if I am, I was taken out of context by someone with an agenda.

I have heard that April Ferguson was so emotionally disturbed after the meeting of Republican Youth on the 6th, that she was unable to function or care for her kids. This is probably untrue. I have a very nice text and picture on my phone that was sent during this supposed breakdown. David Lindquist was on the phone with her immediately following this supposed break down, and her husband immediately after that. This all happened, supposedly right after a meeting which had just ended, where everyone saw her in good spirits. Someone called the police to inform them about this breakdown. This was a false police report about a lie.

Whoever is spreading such rumors needs to stop. Whoever hears these rumors needs to tell the story-teller they are not interested. April will need to stop defending herself.

I have heard someone is spreading rumors that Autumn is not in our caucus, but actually a purple. That is nonsense, and whoever is saying that has an alternate agenda. This rumor has been laid at April's feet, but I have never heard her suggest anything of the sort.

Jesse Young suggested that he stopped a plan to trash April on the Outlaw Network. How incredibly stupid would such a plan be?

He also wants to have a KCRP that prefers him and is competent to assist him. To that end it has been suggested that we excise Juliana from the board.

Glenny, April, and everyone else who knows, understands that Jesse does not have a clear picture, is not the Chair of the KCRP, and has little regard for the parts of the party which do not affect him. Any rumors from that camp which disparage Juliana's conservative credentials need correction. Her long service to this board and her unifying presence have never been brought to bear by any non-conservative faction. Juliana is key to success for the Conservative Caucus.

Here is what needs to happen by everyone. Cease fire. Cease fire, Cease fire.

11/9/2020

Yahoo Mail - 23rd LD circular firing squad and other matters.

Your fault, my fault, his fault, her fault, our fault, their fault, nobody's fault., just STOP. Do not say it or hear it.

All comments about Autumn, Pam, Elaina, April, David, Juliana, Glennie or anyone else need to cease and never be voiced again. It is a losing distraction.

The 23rd LD and the 26th are the saviors of the Kitsap County Republican Party. Glennie is fighting her own rumors.

It seems the best way to gather enemies is to actually accomplish great things. The enemies are usually identifiable by their lack of accomplishment. But know this: Without a fully functioning 23rd LD, this party will fall into ineffectiveness, and its color will be purple.

There is absolutely zero doubt in anyone's mind that April created the 23rd and made it a success. Tearing her down is the most ridiculous idea anyone has had yet, who cares about this organization. If one does not like someone in this party, then just find someone else to work with, and speak no evil.

As we approach a time to assemble the Conservative Caucus, I have heard a couple of people do not want April "at the first meeting". If these persons have their way, I will not be at the meeting. Not because of some loyalty to April, but because such a meeting would just be the first meeting of people engaged in a lost cause. It would not be worth my time or anyone's to attend such a meeting, just to have the conservative caucus' ass handed to it by a coalition of Michelle-lovers, revenge-seekers, returning incompetents, and the purples.

You see, that group of miscreants, along with the loyal opposition CAN AND WILL work together.

I suggest we pull our heads out of our asses and focus.

Of course, if you think I am untrustworthy, unwise, uninformed, inexperienced, or incompetent, you may disregard my advice, and watch the things you have built burn to ashes right in front of you.

Cease Fire, do not relate rumors, and put rumor-mongers on notice that we do not need their service as poisoner of our goals.

Yours in the Service of Liberty,

Tony Stephens

PDC Exhibit 2



**23rd Legislative
District
Republicans**

23rd Legislative District Republicans
2916 Bucklin Hill Rd Ste 175
Silverdale, WA 98383

Jennifer Hansen
Compliance Coordinator
PDC Support
pdc@pdc.wa.gov
360.586.4555 / 360.753.1111

December 11, 2020

Enclosures:

- (1) Declaration of April Ferguson, Chairman, 23rd Legislative District Republican Committee
- (2) Statement of Mark DeBenon, Former Treasurer
- (3) Statement of David Lindquist, Current Treasurer
- (4) Minutes of 23rd Legislative District Republican Committee meeting, December 9, 2020

Subject: PDC Case Number 80600

Ms. Hansen,

Greetings. On November 20, 2020 your office sent the 23rd Leg Dist Republican Committee (the Committee) notice of complaints from Elaina Gonzales-Blanton on November 9th & 10th, 2020, which has been assigned PDC Case Number 80600. The complaints allege violations of three certain requirements related to the PDC. This letter is a response from the Committee (See Encl (4)). It contains results of our investigation, describes our corrective actions, and points out mitigating factors.

Allegations One and Two: The year 2020 presented the Committee with two challenges in regard to meeting the requirements for PDC depositing and reporting. 1. The Committee was hampered by the resignation of our treasurer in early March. The electing committee was not able to supply an immediate replacement because they were prohibited from meeting by Washington State's COVID-19 restrictions. 2. Even after the replacement treasurer was elected in June, it was impracticable to start turning over the Committee's bank account and treasurer responsibilities until about September 11, 2020. This was caused by the ongoing COVID-19 restrictions and our bank's branch closures. (See mitigating factors in Encl (2) and Encl (3) section 2).

The result was that between March and mid-October, efficient treasurer operations were curtailed. During that time, in an election campaign season, the Committee continued to operate by obtaining contributions and making authorized expenditures. The Committee fell behind in the timely depositing and reporting of some of the contributions and expenditures. See mitigating factors in Encl (1), para 4&5; Encl (2) and Encl (3), section 2.

The Committee began taking up action to make late reports in September 2020 (Encl (3) section 2.a). See Encl (3) sections 1 and 2 for mitigating factors. The time frame suggests that this corrective action would also be considered a mitigating factor. Ongoing action with the treasurer to amend the reports is currently progressing in close coordination with a PDC Filer Assistance Specialist (Encl (3) para 2.c). Further corrective action was approved by the Committee on December 9, 2020 to obtain an independent compliance review by a qualified individual following completion of the amendments activity that is now in-progress. (Encl (4)).

The compliant raised a question regarding fundraising deposits from 8/29/20 to 9/18/20 (PDC form C-3, 101002579). Enclosure (1), paras 4-5 indicate that all contributions were deposited (with exception of the error noted in Encl (1), para 5). In addition, the Committee has performed a fundraising to inventory comparison. The comparison validates that the amounts are correctly reported.

Allegation Three:

1. The committee denies the allegation that it failed to fully comply with the request for inspection of books. See Narrative 1 below.
2. The Committee denies that it was aware of the inspection party's intention to include a third person to the inspection as is alleged in the complaint description. See Narrative 2 below.
3. The subject complaint on page 35 alleges: "Mr Lindquist was asked where the rest of the records were and he said, 'this is all April would let me have.'" Mr. Lindquist denies that he made any statement(s) to that effect. (Encl (3), para 3.b)
4. Ms Ferguson and Mr Lindquist did not request to see identification because Gonzales-Blanton and Madden-Boyer were personally know to both of them.

Narrative 1: At the appointed time and place April Ferguson and Treasurer David Lindquist were ready to receive the two inspectors. Two table were arranged about three feet apart and a third table across the top. This was intended to accommodate the inspection party and allow for comfortable separation greater than 6 feet during the inspection. An appropriate place was provided for Ferguson's infant son close to his Mother in a car seat. One of the inspectors stated that an auditor would also be coming to the meeting. They were told an added person would not be allowed since it was not prearranged. The inspectors were informed before the meeting that recording and photos would not be allowed. The inspectors were confronted for recording the meeting and told to stop since it was not prearranged. Even so, Madden-Boyer attempted to photograph documents and was confronted and told to stop. Mr Lindquist denies that any threats were made by himself or Ferguson. The meeting became contentious over the inspection party's pressing for the above requests that were not prearranged. The meeting was terminated after about 15 minuted by one of the inspectors (Madden-Boyer). See Encl (1), paras 8 & 9; and Encl (3), section 3.


Narrative 2: Page 40 of the subject complaint is a copy of an email indicating that a request was made on Oct 29, 2020 3:03 PM from Elaina Gonzales-Blanton for herself and Pam Madden-Boyer to inspect the Committee's books on October 30, November 1, or November 2, 2020. No other persons were listed as inspectors or observers on the request. After several emails between April Ferguson and Gonzales-Blanton (See Complaint pages 39, 37 & 36) an agreement was reached to meet at 3 PM on November 3, 2020 at a certain location in Silverdale, WA (See Complaint page 36). There is no evidence in the emails of a third person participating in the inspection. It must be noted that the email address katiemadden2018@gmail.com appeared in the address section of the Gonzales-Blanton of email of Nov 2, 2020 04:32 PM (Complaint page 39). This appears to be the name or alias of a third person claimed to be part of the inspection party. However, there was no explicit indication given to the Committee, verbal or writing, of a request to add a third person to the inspection party.

Conclusion:

Upon review of other information contained in the complaint, the Committee's assessment is that it represents a scurrilous attack on the Committee and its chairman and is not pertinent to the areas of law identified in the allegations. In conclusion, we hope that the information contained in our response is helpful to your evaluation of the complaint. Please contact us if you need additional information.

Sincerely yours,


April Ferguson, Chairman
12/9/2020


David Lindquist, Treasurer
12/9/2020

ENCLOSURE 1

DECLARATION OF APRIL FERGUSON IN RESPONSE TO THE COMPLAINT FILED AGAINST THE 23RD
LEGISLATIVE DISTRICT REPUBLICANS

I April Ferguson state the following:

I am over the age of 18 and of sound mind and competent to testify in this matter and I state as follows:

SUPPORTING EXHIBITS:

Exhibit A ... Communications with the PDC

Exhibit B ...Communications with the PDC

Exhibit D... Communication with Elaina Blanton

Exhibit E... Layout of room during public inspection of records

Exhibit F...Email communications with PDC

Exhibit G...Email Communication with Mark

BACKGROUND/ROLE CONCERNING PDC FILINGS

1. I am the Chairman of the 23rd Legislative District Republicans and was elected in January of 2019. Until October 2020, I did not have prior involvement in reporting to the PDC for the committee. I acted solely as the chairman. My only involvement in the funds with the 23rd was in making expenditures, receiving contributions, and depositing them. I was one of three signers on the account which were myself, the treasurer, and a former member of the committee.
2. To my knowledge from the period that David Lindquist was elected until the transfer was made September 11th we had fallen behind in reporting and I worked to help get the new and old treasurer to meet together. My goal as chair was to facilitate the transfer. I have read the facts mentioned in Mark DeBenon's statement and I incorporate by reference those facts concerning the transfer and the contributing factors behind some of the difficulties with the transfer as correct.
3. I took on the responsibility during the transfer to review the treasurer's work and help find any discrepancies that needed to be corrected. I took the exhibit attached to the complaint called "2020 Discrepancies" and performed a thorough review looking for discrepancies for the entire year. I then listed them and communicated with the PDC for filing assistance. When discussing about making the corrections myself, they requested that David Lindquest perform the corrections. This would allow him to get "on-the-job" training with the help of a filing assistant. We are currently in the process of amendments. I have attached the email communications with the PDC showing our

efforts to work on the corrections both prior to the complaint being placed and after. Attached as **exhibit A**. This email history shows our attempt to correct the problems and our open communication with the PDC concerning the missing filings all the way back to October.

FACTS CONCERNING MAKING DEPOSITS

4. During the transfer of treasurers, I continued assisting by making deposits. I know that we did make late deposits due to the complications caused by COVID-19 restrictions. Our closest bank branch closed and only local branch that is open is over 40 minutes away from my residence. We are in the process of determining how to make this easier.
5. I also discovered another error because I mistakenly believed I could keep a portion of our fundraising monies to pay our vendor instead of depositing all the money first. When discussing this with the PDC, they instructed me to deposit the money and pay him later. This only happened once back in Sept. and the PDC is helping us correct this error in our amendments. **Exhibit A and B** shows my communication with the PDC concerning the depositing of money and errors as well as instructions on what to do about those errors. All contributions were deposited other than that.

FACTS CONCERNING INSPECTION OF RECORDS

6. On October 29th Elaina requested a public inspection of records and listed herself and Pam Madden Boyer in the body of the email saying "for myself and Pam Madden-Boyer". This is substantiated by **Exhibit D**. Elaina and Pam had requested on their behalf within the time of open inspection of records. On the 1st there was a schedule concern, so we rescheduled for the following day the already scheduled inspection for Pam and Elaina. Elaina then sent a communication the day prior with Katie Madden copied but did not list her or mention her as going to be in attendance and the communication was just a reschedule. I was not even questioning why she would copy my communications to Katie Madden because I knew Katie Madden was with a radio show that had been making shows about my performance as a chair and my candidacy. Elaina gave no communication to even suggest that Katie would be coming. Then the following day when they arrive Pam comes in the room first and is going to sit down at the table. Elaina comes in following. I told them "No recording or taking of pictures will be permitted today". Pam started to go through the records but divided it up to have Elaina go through a portion of the months. At that time Pam stated "An auditor is going to be coming today to audit the records" I being two tables away from them and sitting down told them that would not be permitted that she would have had to be in the scheduling email that was initially made on prior to the ending of the period to request inspection which we had now passed. Pam then said that she had included her and listed her. I questioned that because I had received no such list and they had made the arrangement with me and our treasurer David was attached in those communications, so I had been under the impression that David and I were on the same page. I then learned from David that the night prior he had received an email from one of them listing a lady's name called Katie Kuzkin. This immediately concerned us because of the fact that they were doing two different scheduled appointments and the one they requested Katie Kuzkin at was for 9:00am that morning and then at the same time they were scheduling with me at 3:00pm and not 9:00am and not mentioning anything of Katie Kuzkin. Neither of us even knew who Katie Kuzkin was but later learned they were using a different name

for Katie and we are thinking maybe a former name. I did not make the connection yet, but it was Katie Madden because Pam had told me "an auditor is coming" and referred to this person as a professional auditor. We told them that the auditor would have to make a separate appointment that it had not been done per RCW. It was at this time Elaina became very nasty in my opinion and started saying "put on your big girl panties April" and then told us "just in case you did not understand me clear enough I am recording". Both David and I recognized that she had been recording because the phone had been held up and that it was ongoing recording and we told her "you mentioned nothing of recording, and we do not give you permission it is illegal to record and I am asking you to stop". David who was standing in the space between the tables between us also asked her to stop as he was standing right by her. It is incorrect that I stood up over her I could have not because there were two tables between us and a space as well, so I was about 8 feet from Pam and 10 feet from Elaina.

7. The next issue arises when Pam tried to take pictures of the documents and I asked her to stop. Pam then asked that we please leave the room to continue the inspection and we said we would not leave the financial records alone and we are not required to be out of the room. She claimed that not leaving would be considered harassment and implied a threat of the allegation if we would not leave her alone with the records. We declined to leave the room. During the inspection they kept using it more like an opportunity to conduct a deposition or something with interrogating type questions against us the officers of the committee which resulted in me repeatedly telling her we were not there to answer all her questions and that she needed to inspect the records which she was there for. Then I caught her trying to sneak pictures and that is when I said "If you are not going to be able to follow the rules, we will have to end the inspection" but I never actually ended the inspection. Instead Pam told Elaina "she is not going to let us doing anything" and Elaina said "Should I call the police" and Pam said " we could use it for the complaint" or something very similar that implied they were going to use something in a false light against us. David and I both looked at each other and I said, "We probably better call the police and make sure the record is correct and report this ourselves". We then discussed who would make the call and I had agreed that I would. When I did that, I asked David if he would give the baby the bottle who had just started to fuss and so he did. The police showed up and during that time with the police we learned that the show up was not in response to their call but to ours because ours involved a possible crime which was the illegal recording. The police told us that Elaina had claimed to delete the recording and that if it showed up, he would know that she had lied. We said we did not want to take it any further we just wanted the record to be made straight to protect ourselves from what seemed like threats against us. **Exhibit E** is a drawn layout of the room.
8. On November 4th, I contacted the PDC and informed them of these things that had happened at the inspection of records and asked them if I had done anything wrong by saying if they cannot follow the rules the inspection would have to end. PDC responded saying that both parties are required to follow the rules and referencing an RCW. This communication is attached as **exhibit A pg 6**. PDC response is attached as **Exhibit F**

OTHER RELEVANT FACTS IN RESPONSE TO COMPLAINTS ALLEGED FACTS

9. The report claims that they repeatedly raised concerns over having no treasurer's reports. This is incorrect. They first raised the concern the last week of September when they demanded a treasurer report that would account for all the money raised at the fundraising events. I explained due to the change in treasurers there was a delay and that a treasurer report would be provided at the next business meeting (Oct. 13th). It was. In good faith, I also requested that Mark DeBenon, the previous treasurer, send a ledger to Pam Madden-Boyer. That also happened on Oct. 13th. See **Exhibit G**
10. It is my observation through all of this that David Lindquest was put into adverse circumstances while learning the treasurer's responsibilities. He was placed under frequent pressure by the complainants to turn over Committee financial information. It appears that they had a personal agenda related to obtaining more money from the 23rd Legislative District Republican Committee. Our committee acted with transparency concerning the transfer of the treasurer roles and had communicated this information during our committee meetings. Elaina and Pam both attended those meetings and were aware of the issues with the transfer of treasurer role and both were candidates that were receiving contributions from the committee and were constantly pressuring the committee to let them know exactly how much the committee had so that they could influence the committee members to give them the money that belonged to the 23rd republicans.
11. In response to the several allegations that I feel are an attack on my character and integrity, I want to say that they are false or said in such a false light they are slanderous. The most distressing fact is that the individuals submitting this complaint did not follow our party policies in addressing such a matter. The purpose of a PDC complaint is to ensure that we are following PDC laws and to ensure transparency to the public. It is not for the purpose of a "he said, she said forum" to go back and forth at each other. It is my belief that our committee has provided the necessary detail regarding the pertinent RCW's that have been cited to us by the PDC (as relevant to the complaint) and that we have shown the good faith of our desire to be in compliance. Despite these slanderous statements against me, as the chair of our committee I am under an ethical obligation to deal with the matters regarding the slander by following our internal processes.
12. I believe that Mark, the past treasurer, worked with dedication and cared very much about following the law and public disclosure. In my reviews, I found very few discrepancies during the time period that he was the treasurer. They were honest mistakes or omissions and that he kept his records and books in order. I have observed that David, our new treasurer, has approached his new role with the same dedication even under the adverse circumstances these past few months. I know that with the help and training he is receiving from the PDC specialist our committee will be in his safe hands going forward. I as the chair will continue to facilitate his success in this position.

I SWEAR UNDER THE PENALTY OF PERJURY OF THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNED AND DATED THIS DAY OF DECEMBER 9th 2020 IN SUQUAMISH WASHINGTON

A handwritten signature in black ink, appearing to read 'April Ferguson', is written over a horizontal line.

April Ferguson

Chairman 23rd Legislative District Republicans

april@wa23rdrepublicans.com

EXHIBIT A

Reporting assistance

7 messages

April Ferguson <aprilforthewin@gmail.com>

Thu, Oct 29, 2020 at 4:23 PM

To: COLIN.PEOPLES@pdc.wa.gov, COLIN.PEOPLES@pdc.wa.gov, David lindquist <1963dbl@gmail.com>

Bcc: Tony Stephens <krpchair@gmail.com>

Colin, and David,

The purpose of this email is to facilitate a door opening for David to have support for help with the PDC. David when I first started working with PDC there were a lot of questions and some of my reports with my campaign were late. PDC has always worked timely with me and worked to help me with compliance. Out of government, I would say PDC is the best at helping the people they serve.

Background explained to Colin is that our Treasurer gave his intent to resign in March. We had a central committee meeting planned to elect a new Treasurer which did not take place because of Covid. We met finally I believe in July for the Central Committee meeting where David was elected. David is trying to take over the PDC requirements but could use some assistance but due to this transfer of position, there is some reporting errors made. David has reached out for help from different people and was unable to get their assistance. I am sending this in an attempt to try to get David connected with PDC and help facilitate him having some PDC support.

I called Colin today and explained that there is a small fundraiser that totaled around 1,000 (in the paperwork I gave to you on the day you did the filing). I mentioned that it is not showing up and my confusion around that as well as several expenditures. I also mentioned that you have been trying to take over this role and that we have about 3,000 - 4,000 in expenditures not reported. He suggested that it is possible that you are not seeing the correct reporting dates because the Committee is not set up for "participating in General elections". He can help us with this but has given me a quick rundown so if we get together we can fix it and get the items reported. We have made no large contributions to anyone so not as worried about the contributions when it comes to reporting last-minute contributions to candidates. We have made no contribution over 250.00 but we did make some mailers and sent out a small limited amount of them so we really need to get that in the system as soon as possible. Most of the expenditures were made after the first week of October. He said we have missed likely two reporting dates. This is what I understand from talking with Colin.

Your report you made was from 8/31 until like mid-October

- 23RD is not set up for participating in the General election and we need to fix that by going onto Orca and doing the following:
- Click - FILE
- Click - COMMITTEE INFORMATION
- THEN AFTER THAT CLICK ON C4 REPORTING PERIODS
- HIS HUNCH IS THAT IT IS NOT SELECTED AS PARTICIPATES IN GENERAL BALLOT SO SELECT THAT THEN CLICK OKAY
- THERE SHOULD BE TWO THAT ARE LATE
- THE EXPENDITURES MAY BE IN THERE BUT IF NOT SELECTED AS GENERAL BALLOT THAT WOULD BE THE ISSUE
-
- THIS WOULD OPEN UP TWO MORE C4 THAT WOULD NEED to be FILED and we will be late on those.
-
- C3 WAS FILED OCTOBER 2ND so we are just behind for October only but I am very sure that the roughly 1,000 small fundraiser event is not showing on the reporting and I see a place where it shows a contribution report for like .05 and I am thinking that was likely you attempting to report but made an error because you would have reported that on the day with the rest of the small fundraisers.
- ALL CONTRIBUTIONS FROM OCTOBER 2ND UNTIL THEN NOW ARE NOT IN COMPLIANCE
- PDC WANTS TO BE ABLE TO HELP OUT SO LETS

Colin can help you and we can meet up and if we do it early morning then if there is any issue I can contact PDC or you and have it fixed probably same day.

April Ferguson

Chairman 23rd Legislative District Republicans

postmaster@pdc.wa.gov <postmaster@pdc.wa.gov>

Thu, Oct 29, 2020 at 4:23 PM

To: aprilforthewin@gmail.com



Your message to COLIN.PEOPLES@pdc.wa.gov couldn't be delivered.

COLIN.PEOPLES wasn't found at pdc.wa.gov.

aprilforthewin
Action Required

Office 365

COLIN.PEOPLES
Recipient

Unknown To address

How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.
- Contact the recipient (by phone, for example) to check that the address exists and is correct.
- The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
- Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: [Fix email delivery issues for error code 5.1.10 in Office 365](#), and then send the message again. Retype the entire recipient address before selecting **Send**.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

Was this helpful? Send feedback to Microsoft.

More Info for Email Admins

Status code: 550 5.1.10

This error occurs because the sender sent a message to an email address hosted by Office 365 but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

The email address exists and is correct - Confirm that the recipient address exists, is correct, and is accepting messages.

Synchronize your directories - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.

Errant forwarding rule - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.

Recipient has a valid license - Make sure the recipient has an Office 365 license assigned to them. The recipient's email admin can use the Office 365 admin center to assign a license (Users > Active Users > select the recipient > Assigned License > Edit).

Mail flow settings and MX records are not correct - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.

For more information and additional tips to fix this issue, see Fix email delivery issues for error code 5.1.10 in Office 365.

Original Message Details

Created Date: 10/29/2020 11:23:07 PM
Sender Address: apriiforthewin@gmail.com
Recipient Address: COLIN.PEOPLES@pdc.wa.gov
Subject: Reporting assistance

Error Details

Reported error: 550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient COLIN.PEOPLES@pdc.wa.gov not found by SMTP address lookup
DSN generated by: DM8PR09MB7255.namprd09.prod.outlook.com

Message Hops

HOP	TIME (UTC)	FROM	TO	WITH	RELAY TIME
1	10/29/2020 11:23:18 PM		mail-wm1-f47.google.com	SMTP	11 sec
2	10/29/2020 11:23:18 PM	rmail-wm1-f47.google.com	BL0GCC02FT008.mail.protection.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	*
3	10/29/2020 11:23:18 PM	BL0GCC02FT008.eop-gcc02.prod.protection.outlook.com	DM5PR09CA0017.outlook.office365.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	*
4	10/29/2020 11:23:19 PM	DM5PR09CA0017.namprd09.prod.outlook.com	DM8PR09MB7255.namprd09.prod.outlook.com	Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384)	1 sec

Original Message Headers

Received: from DM5PR09CA0017.namprd09.prod.outlook.com (2603:10b6:4::27) by DM8PR09MB7255.namprd09.prod.outlook.com (2603:10b6:5:2f0::23) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3499.18; Thu, 29 Oct 2020 23:23:19 +0000
Received: from BL0GCC02FT008.eop-gcc02.prod.protection.outlook.com (2a01:111:f400:7d05::207) by DM5PR09CA0017.outlook.office365.com (2603:10b6:4::27) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3499.18 via Frontend Transport; Thu, 29 Oct 2020 23:23:18 +0000
Authentication-Results: spf=pass (sender IP is 209.85.128.47) smtp.mailfrom=gmail.com; pdc.wa.gov; dkim=pass (signature was verified) header.d=gmail.com;pdc.wa.gov; dmarc=pass action=none header.from=gmail.com;compauth=pass reason=100
Received-SPF: Pass (protection.outlook.com: domain of gmail.com designates 209.85.128.47 as permitted sender) receiver=protection.outlook.com; client-ip=209.85.128.47; helo=mail-wm1-f47.google.com;
Received: from mail-wm1-f47.google.com (209.85.128.47) by BL0GCC02FT008.mail.protection.outlook.com (10.97.10.85) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.3520.17 via Frontend Transport; Thu, 29 Oct 2020 23:23:18 +0000
Received: by mail-wm1-f47.google.com with SMTP id w23so1321523wm1.4; Thu, 29 Oct 2020 16:23:18 -0700 (PDT)
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=gmail.com; s=20161025; h=mime-version:from:date:message-id:subject:to; bh=twI5jbJhEeCKKFvbNP/GaU6yo86XvMy8XbRTNGk2ohk=; b=rCtBkFJheQOQx0x0PqQFyF0+RqYJoOSPbmsyl7W6pidoaFD7pgun3Wf21bwzODktWJ2nbdy2/lGpyqEQ1UCRksToZmbsQo045mGXjHaqW0Qus9tFx1D05XFfZvaV2cv5EsrVAVa51LHXU7XKPN0QIV0y8vEPawVoLCvoI0f7gr+mpJ+ErXKf34quGyx/AooY/IFi4q8umFsdccQDPcNUweGw4rxawSH1s1Vo65Xtk9mFUV2VW25hv/cDAYCjdGKQWfw4s19ysnaGrIR73F4GD14xqKqKYyy9Q005aD0Z7f60YJkd+f944W6x51mH8nQLwgoeHBuTRVoy8u1M AXVw==
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=1e100.net; s=20161025; h=x-gm-message-state:mime-version:from:date:message-id:subject:to; bh=twI5jbJhEeCKKFvbNP/GaU6yo86XvMy8XbRTNGk2ohk=; b=dgxahRLfEGPWJ2kCzH7box4Uve1WktAxJ4u4PaczjFFFTf1G1aQ1NabMIGkv5bulz

s://mail.google.com/mail/u/2?ik=5bea7a568b&view=pt&search=all&permthid=thread-a%3Ar-6925438311934037753&siml=msg-a%3Ar-78952137... 3/6

M0qVNVyUN0VvYAN66KZZJ1NEQ10Swrrp61C1TVKXDTKE6LN5WXLJ1K+11Z4CNGP1Xq0
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PI5g==
X-Gm-Message-State: AQAM532Wk0uQYAdt4N4StJ1G+MUJ881275Vgpp70QP/BFCcRHNxy1lv
V1edLrRuNF3XepvMSZMLMfHhW1lyH01Ze8a2081Nz5D
X-Google-Smtp-Source: ABdhPJxbpNXcD1FT4IyOk1NSXq/bz9185u02TRHuOmHb9NZHFuzojIDHC653AAvtavKVWjnyGdJ5+XyGM17nQW23T0c=
X-Received: by 2002:a7b:c085:: with SMTP id r5mr1294671wmh.17.1604013796494;
Thu, 29 Oct 2020 16:23:16 -0700 (PDT)
MIME-Version: 1.0
From: April Ferguson <aprilforthewin@gmail.com>
Date: Thu, 29 Oct 2020 16:23:07 -0700
Message-ID: <CAOGUj0t+GjwCzNNbnBSDMqFvidqSk7RXiScaBCy2qhcqWfg@mail.gmail.com>
Subject: Reporting assistance
To: COLIN.PEOPLES@pdc.wa.gov, COLIN.PEOPLES@pdc.wa.gov,
David lindquist <1963dbl@gmail.com>
Content-Type: multipart/alternative; boundary="0000000000008e107205b2d790ca"
Return-Path: aprilforthewin@gmail.com
X-EOPAttributedMessage: 0
X-EOPTenantAttributedMessage: c76ee947-bb67-4cfc-97d1-511342745035:0
X-MS-PublicTrafficType: Email
X-MS-Office365-Filtering-Correlation-Id: bc838b5d-2434-42e6-117d-08d87c619e52
X-MS-TrafficTypeDiagnostic: DM8PR09MB7255;
X-MS-Exchange-Organization-AuthSource: OLM:8882;
X-Microsoft-Antispam: BCL:0;
X-Microsoft-Antispam-Message-Info:
=?us-ascii?Q?m1z/xwTSqsPcrjC9yohN6dr5p3yCgkZy15YjJ6ZRjnc0Waz2b1m6ITWtupu?=
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=?us-ascii?Q?oZT55jfNFYSmp1M9D0o3zVo5W0g=3D=3D?=
X-Forefront-Antispam-Report:
CIP:209.85.128.47;CTRY:US;LANG:en;SCL:1;SRV:;IPV:NLI;SFV:NSPM;H:mail-wm1-f47.google.com;PTR:mail-wm1-f47.
google.com;CAT:NONE;SFS:(4636009)(3480700007)(33964004)(58800400005)(86362001)(7116003)(336012)(76482006)(73392003)
(1096003)(356005)(55446002)(26005)(7596003)(6666004)(6862004)(83380400001)(7636003)(22186003)(6636002)(5660300002)
(42186006)(8676002)(82202003)(54886005)(67856001);DIR:INB;
X-MS-Exchange-CrossTenant-OriginalArrivalTime: 29 Oct 2020 23:23:18.2695
(UTC)
X-MS-Exchange-CrossTenant-Network-Message-Id: bc838b5d-2434-42e6-117d-08d87c619e52
X-MS-Exchange-CrossTenant-Id: c76ee947-bb67-4cfc-97d1-511342745035
X-MS-Exchange-CrossTenant-AuthSource:
BLOGGCC02FT008.eop-gcc02.prod.protection.outlook.com
X-MS-Exchange-CrossTenant-AuthAs: Anonymous
X-MS-Exchange-CrossTenant-FromEntityHeader: Internet
X-MS-Exchange-Transport-CrossTenantHeadersStamped: DM8PR09MB7255

Final-Recipient: rfc822;COLIN.PEOPLES@pdc.wa.gov

Action: failed

Status: 5.1.10

Diagnostic-Code: smtp;550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient COLIN.PEOPLES@pdc.wa.gov not found by SMTP address lookup

----- Forwarded message -----

From: April Ferguson <aprilforthewin@gmail.com>

To: COLIN.PEOPLES@pdc.wa.gov, COLIN.PEOPLES@pdc.wa.gov, David lindquist <1963dbl@gmail.com>

Cc:

Bcc:

Date: Thu, 29 Oct 2020 16:23:07 -0700

Subject: Reporting assistance

Colin, and David,

The purpose of this email is to facilitate a door opening for David to have support for help with the PDC. David when I first started working with PDC there were a lot of questions and some of my reports with my campaign were late. PDC has always worked timely with me and worked to help me with compliance. Out of government, I would say PDC is the best at helping the people they serve.

Background explained to Colin is that our Treasurer gave his intent to resign in March. We had a central committee meeting planned to elect a new Treasurer which did not take place because of Covid. We met finally I believe in July for the Central Committee meeting where David was elected. David is trying to take over the PDC requirements but could use some assistance but due to this transfer of position, there is some reporting errors

tps://mail.google.com/mail/u/2?ik=5bea7a568b&view=pt&search=all&permthid=thread-a%3Ar-6925438311934037753&siml=msg-a%3Ar-78952137... 4/6

David has reached out for help from different people and was unable to get their assistance. I am sending this in an attempt to try to get David connected with PDC and help facilitate him having some PDC support.

I called Colin today and explained that there is a small fundraiser that totaled around 1,000 (in the paperwork I gave to you on the day you did the filing). I mentioned that it is not showing up and my confusion around that as well as several expenditures. I also mentioned that you have been trying to take over this role and that we have about 3,000 - 4,000 in expenditures not reported. He suggested that it is possible that you are not seeing the correct reporting dates because the Committee is not set up for "participating in General elections". He can help us with this but has given me a quick rundown so if we get together we can fix it and get the items reported. We have made no large contributions to anyone so not as worried about the contributions when it comes to reporting last-minute contributions to candidates. We have made no contribution over 250.00 but we did make some mailers and sent out a small limited amount of them so we really need to get that in the system as soon as possible. Most of the expenditures were made after the first week of October. He said we have missed likely two reporting dates. This is what I understand from talking with Colin.

Your report you made was from 8/31 until like mid-October

- 23RD is not set up for participating in the General election and we need to fix that by going onto Orca and doing the following:
 - Click - FILE
 - Click - COMMITTEE INFORMATION
 - THEN AFTER THAT CLICK ON C4 REPORTING PERIODS
 - HIS HUNCH IS THAT IT IS NOT SELECTED AS PARTICIPATES IN GENERAL BALLOT SO SELECT THAT THEN CLICK OKAY
 - THERE SHOULD BE TWO THAT ARE LATE
 - THE EXPENDITURES MAY BE IN THERE BUT IF NOT SELECTED AS GENERAL BALLOT THAT WOULD BE THE ISSUE
- THIS WOULD OPEN UP TWO MORE C4 THAT WOULD NEED to be FILED and we will be late on those.
- C3 WAS FILED OCTOBER 2ND so we are just behind for October only but I am very sure that the roughly 1,000 small fundraiser event is not showing on the reporting and I see a place where it shows a contribution report for like .05 and I am thinking that was likely you attempting to report but made an error because you would have reported that on the day with the rest of the small fundraisers.
- ALL CONTRIBUTIONS FROM OCTOBER 2ND UNTIL THEN NOW ARE NOT IN COMPLIANCE
- PDC WANTS TO BE ABLE TO HELP OUT SO LETS

Colin can help you and we can meet up and if we do it early morning then if there is any issue I can contact PDC or you and have it fixed probably same day.

April Ferguson
Chairman 23rd Legislative District Republicans

Kim Bradford <kim.bradford@pdc.wa.gov>
To: "aprilforthewin@gmail.com" <aprilforthewin@gmail.com>, "1963dbi@gmail.com" <1963dbi@gmail.com>
Cc: Colin Peeples <colin.peeples@pdc.wa.gov>

Thu, Oct 29, 2020 at 4:37 PM

Hi April and David,

I'm glad to hear that Colin has been helpful, but I think at this point we need to get you in touch with our filer assistance specialist team. David, please submit your questions to pdc@pdc.wa.gov so that the team can begin assisting.

Kim Bradford
Communications and Outreach Director
Public Disclosure Commission

[Quoted text hidden]

April Ferguson <aprilforthewin@gmail.com>
To: Kim Bradford <kim.bradford@pdc.wa.gov>
Cc: "1963dbi@gmail.com" <1963dbi@gmail.com>, Colin Peeples <colin.peeples@pdc.wa.gov>

Thu, Oct 29, 2020 at 4:48 PM

That works also I just wanted to make sure that David works with someone who is familiar with the situation so he can get the help he needs in his new role and able to bring us into compliance.

Familiarity can make the learning process easier. Everyone at the PDC has always been helpful so we can't go wrong with anyone on the assistance team.

April Ferguson

[Quoted text hidden]

Kim Bradford <kim.bradford@pdc.wa.gov>
To: April Ferguson <aprilforthewin@gmail.com>
Cc: "1963dbi@gmail.com" <1963dbi@gmail.com>, Colin Peeples <colin.peeples@pdc.wa.gov>

Fri, Oct 30, 2020 at 10:09 AM

<https://mail.google.com/mail/u/2/?ik=5bea7a568b&view=pt&search=all&permthid=thread-a%3A6925438311934037753&simpl=msg-a%3A78952137...> 5/6

Thanks, April. Submitting to pdc@pdc.wa.gov allows PDC staffers to collaborate on assisting the committee and track the issues that you're having.

David, in addition to one-on-one help, there are some resources available to help you learn more about ORCA. We have a class coming up on Nov. 18: <https://www.pdc.wa.gov/training/online-orca-training-candidates-political-committees-6>. We also have a video of class material that is available for viewing at any time: <https://youtu.be/QenaiJ3DbhM>

Kim

[Quoted text hidden]

Kim Bradford <kim.bradford@pdc.wa.gov>
To: April Ferguson <aprilforthewin@gmail.com>
Cc: "1963dbl@gmail.com" <1963dbl@gmail.com>, Colin Peeples <colin.peeples@pdc.wa.gov>

Wed, Nov 4, 2020 at 4:19 PM

David, have you had a chance to connect with our filer assistance team? We need to get the committee's reports up to date.

Kim

[Quoted text hidden]

April Ferguson <aprilforthewin@gmail.com>
To: Kim Bradford <kim.bradford@pdc.wa.gov>
Cc: "1963dbl@gmail.com" <1963dbl@gmail.com>, Colin Peeples <colin.peeples@pdc.wa.gov>

Wed, Nov 4, 2020 at 5:57 PM

Kim,

I worked with David and we worked updating but I am thinking there is a couple of contribution that needs to be amended so our next day will be working on those together. We also saw the PDC said after we entered everything that we have 450.00 that we should have in the bank but we only have 250.00 so think there are a few errors. I am going through it with a fine-tooth comb trying to find the errors. We have a few mistakes I think that we go through it with a fine-tooth comb we could get them amended and going forward we should be in complete compliance. We have created some forms for filing out by the treasurer as he receives contributions and receipts for expenditures that include on the forms the upcoming filing dates and requires him to check the date it must be filed so on a filing date he will be able to just pull the forms and know what gets entered in and what does not and then check the forms in the checkbox to show they have been reported to the PDC and on which dates (this is a good method for tracking and having reminders to when things must be filed). I also am helping David until it is all corrected because it is much easier to learn on something if you are not trying to fix prior mistakes or build up. You will hear from me as well as him over the next week as we work on correcting.

You should also know that there is an individual that asked for a public inspection. This individual's behavior has been out of control. When they arrived for inspection we asked for no video recording or pictures to be taken. They started going through the documents and then informed us an auditor is showing up to audit the records. We told them that was not acceptable because by law they must state everyone participating in the inspection of records. They then informed us they had been recording us which we informed them was illegal. During the visit we tried to not engage where not necessary but this was made nearly impossible as they would try to question us beyond the scope of the purpose of inspection of records and throw remarks like "April put on your big girl panties" I informed them we were not there to be questioned and that they needed to proceed with their inspection. They then started asking us to leave the room and let them inspect alone. When we said we would not they said that it was harassment for us to remain in the room. They tried to ask us questions and interrogate us as well and I informed them an inspection of records is not a time to do a verbal questioning of the committee (not a deposition or something). They then started trying to sneak pictures of the records by trying to hide the fact they were taking pictures. When this happened I told them "the examination will have to end if they cannot follow rules". We did not actually end we just asked them to comply with our rules and I stated RCW concerning the examination of records. When this happened the one individual told the other "she is not going to let us do anything" and the other said "should we call the police" the other responded "yes" and then said something to "we could use the police report for our court case". When this happened we had to contact the police concerning the inspection of records and inform them the illegal recording was taking place and the threats which seemed like they were trying to intimidate us and in my opinion extort us into allowing them to do more than they were allowed to do. Police took the report and did inform us that the individual had claimed to delete the illegal recording of the inspection of records but did admit to its existence and it taking place.

We had our books in an order other than a few PDC errors we had on us the necessary records, from bank statements, ledgers, receipts, documentation of transactions and contributions like the Paypal history and more but they wanted in addition things we do not keep such as the last four digits of the debit card number for each contributor. Can you correct me in case I am wrong? Are we required to have the last four digits of the credit card numbers on the list of contributors?

On top of the issue, we are dealing with on trying to get our PDC in compliance we are dealing with someone that appears to have a bad motive and in my opinion exploiting the fact that our treasurer is learning and trying to ensure we come into compliance in the areas we fell behind. Are we in the right to ask them to comply with the rules concerning the inspection of records? Was there anything wrong with the fact we did not have the last 4 digits of debit card numbers with each contributor? Is there any PDC violation in these two things? I would appreciate some clarity

April Ferguson

[Quoted text hidden]

EXHIBIT B

Re: PDC - Question

3 messages

PDC Support <pdc@pdc.wa.gov>

Tue, Nov 17, 2020 at 11:24 AM

Reply-To: PDC Support <pdc@pdc.wa.gov>

To: aprilforthewin@gmail.com

Good morning April,

Thank you for reaching out with your inquiry regarding depositing funds. Please be advised that RCW 42.17A.220 requires that all contributions be deposited in your campaign depository (bank account) within five business days of receipt. Expenditures should then be made from that account, not using cash directly.

If you are currently out of compliance with the timeliness requirement, you should immediately deposit those funds and report the late deposit on a C-3 report in accordance with RCW 42.17A.235.

Thank you,

Mx. Fox Blackhorn**Compliance Coordinator 2****Pronouns: They/Them/Their****360.753.1980 | 360.753.1111****Public Disclosure Commission**

Shining Light on Washington Politics Since 1972

—
Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission

<http://www.pdc.wa.gov>

1.360.753.1111

On Tue, 17 Nov at 11:03 AM , April Ferguson <aprilforthewin@gmail.com> wrote:

I cannot find in the laws if it is okay if a political committee keeps cash on hand instead of depositing and pays a vendor with contributions received. There was Trump sales. I kept on me the cash to pay the vendor but I reported the contributions resulting from the Trump sales but kept on hand the cash. Is this an issue?

Should have I deposited and then paid. I still have the funds and am paying the vendor tomorrow? Would it be better to deposit and then pay the vendor or can I pay the vendor with the cash?

Would like some clarification if I made an error on this and would it be better to deposit late and still make the payment or not deposit at all and just make the payment?

April Ferguson

April Ferguson <aprilforthewin@gmail.com>

Tue, Nov 17, 2020 at 11:39 AM

<https://mail.google.com/mail/u/2?ik=5bea7a568b&view=pt&search=all&permthid=thread-f%3A1683636698673682257&siml=msg-f%3A16836366986...> 1/2

to: PDC Support <pdcc@pdc.wa.gov>

That is the problem I think it was reported as deposited but it was not actually so the only issue is I need to actually deposit it . It's not too much but I am trying to find any place where we did not follow and get corrected; I was mistaken on this about keeping money on hand to pay vendors .

Thanks we will deposit and see if there is a way to amend date deposited .

Sent from my iPhone

On Nov 17, 2020, at 11:24 AM, PDC Support <pdcc@pdc.wa.gov> wrote:

[Quoted text hidden]

PDC Support <pdcc@pdc.wa.gov>
Reply-To: PDC Support <pdcc@pdc.wa.gov>
To: aprilforthewin@gmail.com

Tue, Nov 17, 2020 at 12:11 PM

April,

Absolutely, thank you for reaching out and clarifying. The C-3 report has a date for contributions received, a date for the deposit, and a date that it's filed. If you've already reported the contribution being received, then you filed a report with an incorrect deposit date. Please deposit the funds and amend your C-3 report to reflect the actual deposit date.

If you need any assistance making the amendments call us at 1-360-753-1111, and when you get to the robot select option 1. They can walk you through the steps of amending or help you if you run into any filing issues.

Have a great day,

Mx. Fox Blackhorn
Compliance Coordinator 2
Pronouns: They/Them/Their
360.753.1980 | 360.753.1111



Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
1.360.753.1111
[Quoted text hidden]

EXHIBIT C

EXHIBIT D

Public Inspection of Committee Financial Records

Elaina Gonzales <elainaluz@yahoo.com>

Thu, Oct 29, 2020 at 3:03 PM

Reply-To: Elaina Gonzales <elainaluz@yahoo.com>

To: April Ferguson <aprilforthewin@gmail.com>, Ralph Adamson <ralphad@comcast.net>, Lindquist David <1963dbl@gmail.com>, Daniel Hodun <dhodun@comcast.net>, Rick Kuhns <rgkuhns@juno.com>, Rick Kuhns <rick.kuhns.wa@gmail.com>, Autumn Bennett <autumnbennett2009@gmail.com>

Hello,

This is a formal request from myself and Pam Madden-Boyer for the 23rd LD Committee Financial Records. As per PDC regulations, we are requesting a public inspection of the committee's financial records and this request must be honored.

We request that this viewing occur on Friday, October 30th, Sunday, November 1st, or Monday, November 2nd at KCRP Headquarters in Silverdale. Pam and I are available any time Friday, Sunday and Monday.

Please bring to this viewing the bank statements for the entire year of 2020.

Thank you,

Elaina Gonzales-Blanton, and Pamela Madden-Boyer

EXHIBIT E

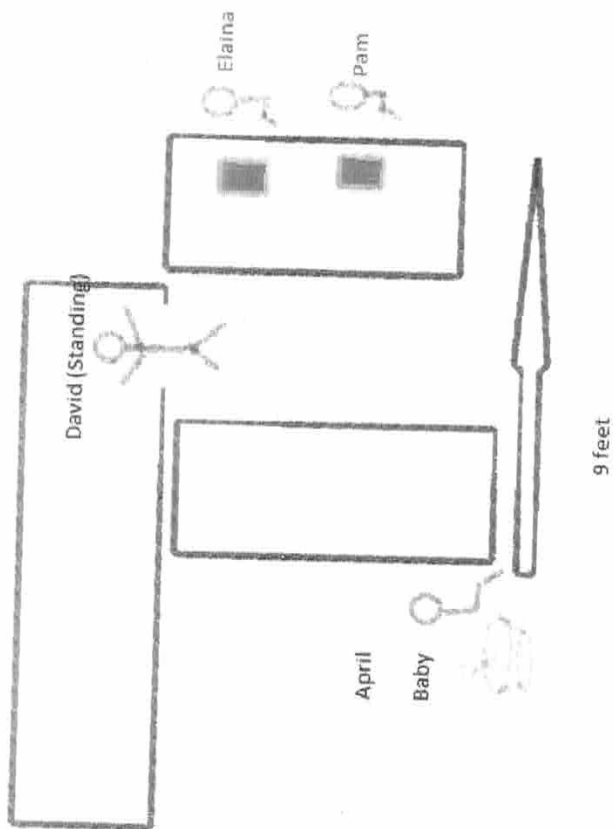


EXHIBIT F

Re: PDC - 23rd LD

3 messages

PDC Support <pdcc@pdc.wa.gov>
 Reply-To: PDC Support <pdcc@pdc.wa.gov>
 To: aprilforthewin@gmail.com
 Cc: 1963dbb@gmail.com

Wed, Nov 4, 2020 at 6:36 PM

Hi April,

Both the requester and the campaign are required to comply with the rules of campaign books inspection, as outlined in WAC 390-16-043 (<https://app.leg.wa.gov/wac/default.aspx?cite=390-16-043>). That rule also details what records must be provided.

Kim Bradford

--
 Washington State law established email as the PDC's official means of communication as of June 7th, 2018 (RCW 42.17A.055). Filers have a duty to amend their reports within 10 days of any material changes, such as new email addresses. Please ensure your email address is up to date.

To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
 1.360.753.1111

On Wed, 4 Nov at 6:34 PM , April Ferguson <aprilforthewin@gmail.com> wrote:
 Kim,

I worked with David and we worked updating but I am thinking there is a couple of contribution that needs to be amended so our next day will be working on those together. We also saw the PDC said after we entered everything that we have 450.00 that we should have in the bank but we only have 250.00 so think there are a few errors. I am going through it with a fine-tooth comb trying to find the errors. We have a few mistakes I think that we go through it with a fine-tooth comb we could get them amended and going forward we should be in complete compliance. We have created some forms for filing out by the treasurer as he receives contributions and receipts for expenditures that include on the forms the upcoming filing dates and requires him to check the date it must be filed so on a filing date he will be able to just pull the forms and know what gets entered in and what does not and then check the forms in the checkbox to show they have been reported to the PDC and on which dates (this is a good method for tracking and having reminders to when things must be filed). I also am helping David until it is all corrected because it is much easier to learn on something if you are not trying to fix prior mistakes or build up. You will hear from me as well as him over the next week as we work on correcting.

You should also know that there is an individual that asked for a public inspection. This individual's behavior has been out of control. When they arrived for inspection we asked for no video recording or pictures to be taken. They started going through the documents and then informed us an auditor is showing up to audit the records. We told them that was not acceptable because by law they must state everyone participating in the inspection of records. They then informed us they had been recording us which we informed them was illegal. During the visit we tried to not engage where not necessary but this was made nearly impossible as they would try to question us beyond the scope of the purpose of inspection of records and throw remarks like "April put on your big girl panties" I

informed them we were not there to be questioned and that they needed to proceed with their inspection. They then started asking us to leave the room and let them inspect alone. When we said we would not they said that it was harassment for us to remain in the room. They tried to ask us questions and interrogate us as well and I informed them an inspection of records is not a time to do a verbal questioning of the committee (not a deposition or something). They then started trying to sneak pictures of the records by trying to hide the fact they were taking pictures. When this happened I told them "the examination will have to end if they cannot follow rules". We did not actually end we just asked them to comply with our rules and I stated RCW concerning the examination of records. When this happened the one individual told the other "she is not going to let us do anything" and the other said "should we call the police" the other responded "yes" and then said something to "we could use the police report for our court case". When this happened we had to contact the police concerning the inspection of records and inform them the illegal recording was taking place and the threats which seemed like they were trying to intimidate us and in my opinion extort us into allowing them to do more than they were allowed to do. Police took the report and did inform us that the individual had claimed to delete the illegal recording of the inspection of records but did admit to its existence and it taking place.

We had our books in an order other than a few PDC errors we had on us the necessary records, from bank statements, ledgers, receipts, documentation of transactions and contributions like the Paypal history and more but they wanted in edition things we do not keep such as the last four digits of the debit card number for each contributor. Can you correct me in case I am wrong? Are we required to have the last four digits of the credit card numbers on the list of contributors?

On top of the issue, we are dealing with on trying to get our PDC in compliance we are dealing with someone that appears to have a bad motive and in my opinion exploiting the fact that our treasurer is learning and trying to ensure we come into compliance in the areas we fell behind. Are we in the right to ask them to comply with the rules concerning the inspection of records? Was there anything wrong with the fact we did not have the last 4 digits of debit card numbers with each contributor? Is there any PDC violation in these two things? **I would appreciate some clarity**

April Ferguson

PDC Support <pdcc@pdc.wa.gov>
Reply-To: PDC Support <pdcc@pdc.wa.gov>
To: aprilforthewin@gmail.com

Fri, Nov 6, 2020 at 7:16 PM

Thank you for contacting the Public Disclosure Commission regarding "23rd LD".

We hope that your request was handled to your satisfaction.

We would appreciate your feedback regarding the resolution of this request.

Please tell us what you think of your support experience.

Awesome

Just Okay

Not Good

EXHIBIT G

23rd Data

6 messages

Mark DeBenon <debenon@gmail.com> Tue, Oct 13, 2020 at 2:19 PM
To: Pam <pammadboy@gmail.com>, Tony Stephens <kcrpchair@gmail.com>, April Ferguson <aprilforthewin@gmail.com>, Dave Lindquist <1963dbl@gmail.com>

Pam,

Here is the bank register from January 1st through September 28th, when I was removed from the account.

To the best of my knowledge, the PDC reporting was complete through mid-September, when I sat down with David Lindquist and he made the entries as I helped him.

Mark

PS
In looking at the data, I just realized that I had accidentally used the 23rd's POS card at Starbucks. My personal account is with the same bank and the cards look the same. The highlighted entry was the mistake - I will return this amount ASAP.

 **202023rdBank.xlsx**
15K

Tony Stephens <kcrpchair@gmail.com> Tue, Oct 13, 2020 at 2:21 PM
To: Mark DeBenon <debenon@gmail.com>
Cc: Pam <pammadboy@gmail.com>, April Ferguson <aprilforthewin@gmail.com>, Dave Lindquist <1963dbl@gmail.com>

That is not a problem. You did not violate the PDC. Just pay back the 23rd. If the board has no problem, there is no problem.

Tony
[Quoted text hidden]

Mark DeBenon <debenon@gmail.com> Tue, Oct 13, 2020 at 2:25 PM
To: Tony Stephens <kcrpchair@gmail.com>
Cc: Pam <pammadboy@gmail.com>, April Ferguson <aprilforthewin@gmail.com>, Dave Lindquist <1963dbl@gmail.com>

Repaid via website.
[Quoted text hidden]

April Ferguson <aprilforthewin@gmail.com> Tue, Oct 13, 2020 at 2:32 PM
To: Tony Stephens <kcrpchair@gmail.com>
Cc: Mark DeBenon <debenon@gmail.com>, Pam <pammadboy@gmail.com>, Dave Lindquist <1963dbl@gmail.com>

Sounds like an accident but I do remember you did say once you were meeting with I think it was Ralph to discuss something and you were like meeting for coffee. I thought that you met to discuss 23rd business but not sure. I had seen that purchase once when checking on history and was not alarmed because I believed you met with Ralph.

On Tue, Oct 13, 2020 at 2:22 PM Tony Stephens <kcrpchair@gmail.com> wrote:
[Quoted text hidden]

ENCLOSURE 2

Mark DeBenon
PO BOX 879
Keyport, WA 98345

December 4th, 2020

Washington 23rd Legislative District Republicans
2916 NW Bucklin Hill Rd. #175
Silverdale, WA 98383

Committee,

I am very pleased to be given an opportunity to help address any aspect of the spurious and malign allegations against the 23rd LD Committee.

Here are the events, to the best of my recollection, which occurred between March 6th, 2020, and September 11th, 2020 as regards the transfer of Treasurer duties between myself and David Lindquist.

On March 6th, 2020, I resigned as Treasurer of the 23rd Legislative district. My understanding was that Washington State RCWs require that a Legislative District would dissolve if there was no active Treasurer, so therefore I committed to "staying on" until a replacement was elected.

As everyone is aware, Governor Jay Inslee began "Lock downs" of society and enterprise on March 23rd 2020, making the possibility of a Kitsap County Republican Party Central Committee (KCRP) meeting (as per the by-laws of the KCRP and the 23rd LD requiring officers of the 23rd LD be elected during Central Committee meetings of the KCRP) impossible. In fact, the 23rd LD committee was precluded from holding meetings during this time-frame as well.

During the June 6th 2020 Central Committee Meeting, David Lindquist was elected as my replacement as Treasurer. I immediately began to request a "transfer" of duties between myself and David. During this time, the Bank of record for the 23rd LD closed ALL branches in the area due to Covid-19, and left a single branch open – in Port orchard – over 15 miles away. It is obvious that with the conflict of schedules, and the Covid-19 restrictions placed upon us, it was many weeks before I was able to remove myself from responsibility over the LD's bank account, and transfer that responsibility to the newly-elected Treasurer. During this period, I was unaware of any transactions within the 23rd, apart from the monthly storage unit rent, and two \$500 donations from the KCRP and the BIRW which were duly reported to the PDC.

I need to state unequivocally the neither the newly-elected Treasurer of the 23rd LD, David Lindquist, nor the Chair of the 23rd LD, posed any incumbrance to getting the banking changes done. It was a matter of distance, work schedules, and Covid-19 restrictions. After transferring control of the 23rd LD Bank account to David Lindquist, he and I were finally able to meet on September 11th, 2020 to transfer the Treasurer duties to him, and hand-off Treasurer data.

On September 11th, 2020 I provided Treasurer Lindquist a binder, containing print-outs all previous C3 and C4 reports, an annotated Bank Ledger, and a USB drive with files such as a back-up of our PDC files, the PDC report-filing token, Donor Envelope graphics, Foreign Entity forms, Logos, and many other items.

On that September 11th meeting at the KCRP offices between myself and David Lindquist I installed the ORCA software on a PC there, and had David enter the transactions reflected in the Bank Ledger (which I had transferred and annotated as I was able) to the PDC, and current as of 9/11/20. There was a single further transaction – monthly rent for the 23rd LD storage unit, the next day which fell under my tenure. On September 12th, 2020, I was satisfied that the 23rd LD PDC requirements had all been met, and the LD was up-to-date with all of their reporting.

Permit me to say at this point, since there are personal allegations against April Ferguson, I want assure the committee that in the past 2 years that I have known the Chair of the 23rd Legislative District, April Ferguson has at no time suggested, hinted, or directly asked that I do anything even remotely corrupt in order to enrich herself personally. Ever. It is my opinion that these allegations against the 23rd have their roots in long-seated personal, as opposed to professional, resentments against April and further I contend that these allegations were nothing more than “performance art” to ensure that April Ferguson is not re-elected as Chair of the 23rd at the 2020 Republican Party Re-Organization meeting. I would like to add that it is my firm belief through personal observation that April Ferguson has done more for the Republican Party as Chair of the 23rd LD, and by extension the KCRP, than anyone else in the KCRP and by a wide margin.

The mission, people, and existence of the 23rd LD is very important to me. I have consistently endeavored to make reports which were both timely and accurate, so that the 23rd LD could effectively advance Republican candidates and causes.

Thank you, again, for the opportunity to clarify these events. I attest that I have detailed, to the best of my recollection, everything of importance that transpired between March 6th, 2020, and September 11th, 2020 as regards the transfer of Treasurer duties between myself and David Lindquist.

If you have any further questions, or requests for documents from me, please contact me via email at debenon@startmail.com.

Best Regards,



Mark DeBenon
PCO 105

ENCLOSURE 3

I, David Linquist (the current 23rd LD Treasurer) state the following:

1. Regarding Allegation #1: Failure to timely deposit funds
 - a. I have a full time job that makes it difficult to conduct treasurer business for the 23rd LD.
 - b. Due to my work hours, I cannot make it to the bank during normal business hours. COVID-19 restrictions have added further difficulties. Our local bank branch has been closed and the only open branch in our area now is located an additional 30 minutes away from our local branch and about 45 minutes from where I live.
 - c. I'm working with the 23rd LD committee on finding better methods to ensure deposits are completed in a timely fashion.
2. Regarding Allegation #2: Not timely reporting contributions & expenses
 - a. I didn't become a fully active Treasurer until September 11th. The previous treasurer and I met at the KCRP office on that day for a turnover of the treasurer duties. I was given a binder, containing print-outs of all previous C3 and C4 reports, an annotated Bank Ledger, along with a USB drive with files. The previous treasurer installed the ORCA software on a PC there and he helped me enter some transactions reflected in the Bank Ledger to the PDC. We also went over information & keys to the mailbox for the 23rd LD.
 - b. I have no computer or printer. So, I currently have to use the computer at the KCRP office. This is very cumbersome due to the distance and gaining access to the office. We are currently working on finding an easier method in order to ensure data required for the PDC is entered in a timely fashion.
 - c. The PDC is made aware of our infractions regarding reporting contributions & expenses as previously stated. I have no "formal" training in the "ORCA" program. PDC personnel are currently providing me on-the-job training for this program as I amend and enter data into the program.
 - d. I do not have any training in accounting or being a treasurer but am learning more about how to be a treasurer every day.
 - e. NOTE regarding on the expense of \$21.58 on 5/10/20 identified in the complaint: My further review of our records revealed that this was actually repaid to the account on 10/13/2020. Our PDC records are being amended to reflect this.
3. Regarding Allegation #3: Failure to fully comply with request for inspection of books
 - a. On Nov. 3rd, Pam Madden-Boyer and Elaina Gonzales-Blanton met April Ferguson and me at the KCRP office to inspect the Treasurer's books.
 - b. They started to look at the books and divide them up. When asked about the treasurer books, at no time did I say "That is all she (April) gave me." They also mentioned that an auditor would also be coming to the meeting. We told them that it wouldn't be allowed as it wasn't in the original email to April that set up the meeting. (This auditor never actually showed up to the meeting.)

- c. Elaina also mentioned she was recording from the time they walked in the room. We told them that we did not agree to that & told them to stop recording.
- d. At no time did April or I threaten Pam or Elaina. However, they displayed anger in a threatening manner when we denied their requests as they were not in compliance with the RCW.
- e. When the conversation became adversarial, Pam got up abruptly and told me to put the books away.
- f. Due to the increased hostility, April said we should call the police and I agreed. They left and April called 911. An officer showed up to take our statements. A police report was filed documenting this incident.



David B. Lindquist
23rd LD Treasurer
PCO 450
12/9/2020

ENCLOSURE 4

23rd Legislative District Republican Committee Meeting Minutes – Dec 9, 2020

Call to order: The 23rd LDR Committee was called to order in executive session at KCRP HQ by the Chair April Ferguson at 7:10 pm.

Purpose of the meeting was to review and approve the report submitted by the Special Committee to respond to PDC complaints from Elaina Gonzales-Blanton on November 9th and 10th, which have been assigned PDC Case Number 80600. See minutes of Dec 2, 2020

Roll Call: Present April Ferguson (Chairman), David Lindquest (Treasurer), members, Rick Kuhns, Ralph Adamson, Absent Autumn Starre Bennet, Excused Daniel Hodun

Minutes of 12/2/2020 are approved without corrections

Treasurer Report: Treasurer is working on amendments with the PDC

Chair requests a statement to PCOs in regard to the PDC complaint to be issued by 6 PM 12/10/2020


New Business:

Motion carried to accept the report forwarded from the Special Committee (filed with minutes). Response to be forwarded to the PDC not later than close of business 12/11/2020.

Motion carried that this committee obtain an independent PDC compliance review for 2020 (up to the start date of the review) by a qualified individual following completion of the PDC amendments activity that is now in-progress.

Motion carried to approve the above minutes of this meeting.

Adjourned by chair at 8:10 pm


Ralph Adamson - Secretary

12/9/2020
Date of Approval