



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

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
(360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

**Memorandum**

To: Public Disclosure Commission

From: Erick O. Agina, Compliance Officer

Date: December 30, 2022

Subject: Enforcement Hearing Memorandum: PDC Case #82263 – Jesse Wineberry & Washington Against Discrimination Everywhere (WADE)

**Allegation(s):**

The Public Disclosure Commission (PDC) staff alleges that Jesse Wineberry, as the principal organizer of Washington Against Discrimination Everywhere (WADE) political action committee, failed to timely file two Summary, Full Report Receipts and Expenditures (C-4) reports for election years 2021 and 2022, disclosing \$25,000 debt owed to DocuSign as carry forward from the 2020 election year, as required for committees registered under the “Full Reporting” option.

**Background:**

- WADE was a political action committee that supported Initiative Measure No. 1776, a statewide ballot measure/proposition in the 2020 election year.
- On June 18, 2020, WADE filed a Committee Registration (C-1pc) report as a “Continuing” committee and listed Dr. Terry Ross, Dr. Lynn French and Amanuel Mamo, and Abdirahman Mohamud, CPA as Main Sponsor, Co-Sponsors and Treasurer, respectively. **[Exhibit A]**.
- On December 20, 2020, PDC staff received a complaint filed by Kan Qiu alleging that WADE and its committee officers failed to report expenditures made in support of a ballot proposition. Specifically, Mr. Qiu’s complaint alleged that WADE and its officers violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary, Full Report Receipts and Expenditures (C-4) reports, disclosing expenditures undertaken by the Campaign for website design and printing costs, as required for a committee registered under the “Full Reporting” option during the 2020 election cycle **[Exhibit B]**.

- PDC staff sent notice of the complaint to WADE on December 23, 2020, and requested a response to the complaint by January 6, 2021 **[Exhibit C]**.
- On January 13, 2021, staff sent a follow up email to WADE regarding the status of the response to the complaint, which was due no later than January 6, 2021.
- On January 28, 2021, staff called and left a voicemail for the committee's treasurer, Abdirahman Mohamud, requesting a call back regarding the status of the committee's response. On the same day, Abdirahman Mohamud called staff back and noted that the committee's email contact [jcwceo@gmail.com](mailto:jcwceo@gmail.com) for Jesse Wineberry, was the correct contact for the committee's report.
- On the same day, January 28, 2021, staff contacted Jesse Wineberry via email noting that staff was provided information from the WADE treasurer that Jesse Wineberry would be the respondent in this matter/complaint **[Exhibit D]**.
- On February 22, 2021, staff sent a Notice of Initial Hearing (Case Status Review) to WADE and Jesse Wineberry via electronic mail **[Exhibit E]**.
- On February 22, 2021, staff received a response to the complaint from attorney Toussaint L. Myricks, who is representing Jesse Wineberry and WADE in this matter **[Exhibit F]**.
- On February 23, 2021, staff sent the Initial Hearing Results for the Initial Hearing/Case Status Review to Jesse Wineberry and his attorney Toussaint Myricks, after opening a formal investigation **[Exhibit G]**.
- On March 5, 2021, staff sent an email to attorney Myricks noting: "In your response, you noted WADE (the Committee) activities include support only initiative 1300 (I-1300). However, both the 2020 and 2021 registrations currently on file with the PDC list the Committee supporting I-1776. Also, the 2020 Committee reported a deficit on its final C-4 for the 2020 election year. However, this deficit was not carried over and no reports were filed for 2021." In the email, staff also requested attorney Myricks to have his client, Jesse Wineberry, and WADE update the Committee's registration and financial data to reflect the supported initiative and also to reflect the status of its financial obligations, including debts owed **[Exhibit H]**.
- On April 20, 2021, staff sent an email follow up to the email sent on March 5, 2021, asking the WADE to amend its committee registration and file a C-4 report to carry forward the debt owed from 2020 to 2021.
- On June 14, 2021, staff again sent an email to attorney Myricks and Jesse Wineberry with follow up questions, specifically, asking about the outstanding \$25,000 debt owed to DocuSign **[Exhibit I]**.
- On December 1, 2021, staff received an email response to the complaint from Lynn French, who is one of the co-sponsors listed on the Committee's registration (C-1pc), stating that he has never been a member of WADE **[Exhibit J]**.

- On December 2, 2021, staff received an email response to the complaint from Abdirahman Mohamud, Treasurer, noting that he was simply hired to record monthly transactions and report to the PDC...noting that he spoke to Mr. Jesse Wineberry “several times regarding this issue and he assured me that it will be taken care of” **[Exhibit K]**.
- On April 22, 2022, staff sent a letter from the PDC general counsel, Sean Flynn, to attorney Myricks and Jesse Wineberry via email **[Exhibit L]**.
- On May 23, 2022, staff received a response (#2) to questions previously posed by staff. In the response, Mr. Wineberry, through his attorney, Toussaint Myricks, acknowledged that the \$25,000 debt owed to DocuSign was still outstanding **[Exhibit M]**.
- On June 22, 2022, staff sent a follow-up email in response to the Respondent’s second response received on May 23, 2022. In the response, staff stated: “Per your response, you note the campaign has ended and the bank account has closed, however there remains a debt. Until the debt is cleared, the campaign has not ended and there continues to be a continuing reporting requirement to the PDC.” Staff also talked to attorney Myricks via telephone on July 14, 2022, and forwarded the June 22, 2022, email and attached a copy of the C-4 report filed on December 11, 2020, depicting a \$25,000 debt owed to DocuSign **[Exhibit N]**.
- On September 13, 2022, staff received an email from attorney Myricks stating that his client, Jesse Wineberry, was in ongoing negotiations with DocuSign regarding the \$25,000 debt...noting that “As you know, my client has fully complied with the PDC’s rules which require the disclosure of the debt. My client will continue reporting the debt until the debt is retired” **[Exhibit O]**.
- On September 27, 2022, staff sent an email follow-up to attorney Myricks asking him to let staff know once his client files the C-4 reports for 2021 and 2022 depicting the carry-forward debt of \$25,000 owed to DocuSign **[Exhibit P]**.
- On November 23, 2022, staff sent another follow-up email to attorney Myricks requesting his client file the two C-4 reports for 2021 and 2022, depicting the \$25,000 debt owed to DocuSign as carry-forward debt **[Exhibit Q]**.
- On December 14, 2022, staff served attorney Myricks and his client, Jesse Wineberry, by electronic mail, with a Hearing Notice for a Brief Adjudicative Proceeding (Brief Enforcement Hearing) to be held on Thursday, January 12, 2023, concerning the alleged violation of RCW 42.17A.235 and .240 for failure to timely file two Summary, Full Report Receipts and Expenditures (C-4) reports, disclosing the \$25,000 debt owed to DocuSign in 2021 and 2022. Staff sent an updated Notice to attorney Myrick via electronic mail on January 2, 2023, to correct an incorrect name that was inadvertently included in the second paragraph of the initial Notice of Brief Enforcement Hearing sent to Attorney Myricks and Jesse Wineberry on December 14, 2022 **[Exhibit R]**.

## **Laws & Rules:**

**RCW 42.17A.235** and **RCW 42.17A.240** require 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 exceed \$200 since the last report; on the twenty-first day and the seventh day preceding the date of the primary and general election date(s); and on the tenth day of the first month after the primary and general election date(s). For debt owed at the end of the campaign cycle or election year/cycle, an obligation to file with the PDC remains until the debt is paid in full and a final report filed depicting the debt has paid in full or forgiven.

### **Exhibit List:**

- **Exhibit A** – Committee Registration (C-1pc) report – WADE; filed June 18, 2020.
- **Exhibit B** – Complaint, PDC Case 82263 – WADE; filed December 20, 2020.
- **Exhibit C** – Notice of Complaint Email from Staff to WADE/Attorney Myricks
- **Exhibit D** – Email to Jesse Wineberry notifying him that he has been identified as the Respondent in this case/matter.
- **Exhibit E** – Notice of Initial Hearing (Case Status Review to WADE/Jesse Wineberry – PDC Case 82263
- **Exhibit F** – Complaint Response (#1) from Attorney Myricks on behalf of Jesse Wineberry – PDC Case 82263.
- **Exhibit G** – Initial Hearing Results after Opening a Formal Investigation – Case 82263.
- **Exhibit H** – PDC staff Email in response to the Complaint Response (#1) with follow up questions from staff – PDC Case 82263.
- **Exhibit I** – Email (June 14, 2021) follow up from staff to attorney Myricks and Jesse Wineberry regarding the \$25,000 debt owed to DocuSign – PDC Case 82263.
- **Exhibit J** – Response to the complaint from Lynn French, Co-Sponsor listed on the C-1pc – PDC Case 82263.
- **Exhibit K** – Response to the complaint from Abdirahman Mohamud, Treasurer listed on the C-1pc – PDC Case 82263.
- **Exhibit L** – Letter from PDC General Counsel to Attorney Myricks and Jesse Wineberry – PDC Case 82263.
- **Exhibit M** – Complaint Response (#2) from Attorney Myricks on behalf of Jesse Wineberry – PDC Case 82263.
- **Exhibit N** – PDC staff email (June 22, 2022) to Attorney Myricks in response to Complaint Response (#2) with follow up questions – PDC Case 82263.
- **Exhibit O** – Email from Attorney Myricks to staff regarding the status of the \$25,000 debt owed to DocuSign – PDC Case 82263
- **Exhibit P** – Email (Sept. 27, 2022) from staff to Attorney Myricks – PDC Case 82263.
- **Exhibit Q** – Email (Nov. 23, 2022) from staff to Attorney Myricks – PDC Case 82263
- **Exhibit R** – Notice of Brief Adjudicative Proceeding (Brief Enforcement Hearing) sent to Attorney Myricks and Jesse Wineberry – PDC Case 82263.



## Campaign Finance

### Washington Against Discrimination Everywhere (WADE)

P O Box 604  
Renton, WA 98057  
abdi@garabeyfinanical.com

#### Registration Filed

Pac  
Full Reporting  
Submitted date: 06/18/2020  
Certified by abdi@garabeyfinanical.com  
Continuing  
WASHI-057

#### Bank Information

Becu  
12770 Gateway Drive South  
Tukwila, WA 98168  
To schedule books review contact abdi@garabeyfinanical.com

#### Officers

##### Dr. Terryl Ross

Main Sponsor  
P O Box 604  
Renton, WA 98057  
abdi@garabeyfinanical.com

##### Dr. Lynn French

Co-Sponsor  
P O Box 604  
Renton, WA 98057  
abdi@garabeyfinanical.com

##### Amanuel Mamo

Co-Sponsor  
P O Box 604  
Renton, WA 98057  
abdi@garabeyfinanical.com

##### Abdirahman Mohamud, CPA

Treasurer  
P O Box 604  
Renton, WA 98057  
abdi@garabeyfinanical.com

#### Ballot Propositions

##### Supporting #1776

© 2019 Washington Public Disclosure Commission

Exhibit A

**Kan Qiu**

reported via the portal

*2 years ago (Sun, 20 Dec 2020 at 1:12 AM)*

It has come to my attention that Washington Against Discrimination Everywhere has repeatedly committed significant and serious violations of Washington States Campaign Finance laws (RCW 42.17A). The Specific violations are identified as follows:

Failure to report expenditures made in support or opposition to a ballot proposition (Violation of RCW 42.17A.240 (6))

Specifically,

1) Washington Against Discrimination Everywhere has failed to report the support and services it received for website yeson1300.com and I-1300 petition form design and printing cost. Petitions are shown on TV news on 11/11/2020(see attached screenshot and also news link at <https://www.kiro7.com/news/local/initiative-bearing-manuel-ellis-name-aims-end-chokeholds-washington/IO2GE4ANPNCQXGRZSC4PT5H7RQ/> ).

2) Washington Against Discrimination Everywhere has failed to report the support and services it received for website yeson1234.com and I-1234 petition form design and printing cost.

This political action committee has clearly violated the law and the PDC should take steps to ensure the law is followed in this matter. Please feel free to contact me if you need further information.

I-1300Petitions.jpg

111.28 KB

9 \ J]h6

**Tabatha Blacksmith**

replied

*2 years ago (Wed, 23 Dec 2020 at 9:06 AM)*

To: abdi@garabeyfinancial.com

Hello Washington Against Discrimination Everywhere (WADE),

The Public Disclosure Commission (PDC) received a complaint from Kan Qiu, which has been assigned PDC Case Number **82263**. Please reference this case number on any future communications with the PDC regarding this complaint.

The Complaint alleges the following:

- Allegation One: Alleged violation of RCW 42.17A.240 for failure to report and/or sufficiently describe expenditures & debt supporting a ballot proposition on C-4 reports (e.g. website & hosting, petition design & printing costs, reimbursement paid on 11/25/20, and Docusign order)
- Allegation Two: Alleged violation of RCW 42.17A.240 for failure to report a contributor's name on a C-3 report (report #100996902)

Please review the attached complaint and provide your response by **January 6, 2020**. For more information about the enforcement process, please see our [Enforcement Guide](#).

Guidance regarding describing expenditures on reports can be found at <https://www.pdc.wa.gov/learn/publications/political-committee-instructions/expenditures-debts/expenditures-require>, in **WAC 390-16-037** and **WAC 390-16-205**.

If you determine that you need to file or amend reports as part of this case and you need help, please reply to this message with a request to be assigned a Filer Assistance Specialist so that you receive timely and coordinated guidance.

If you have any questions, please reply to this email.

Thank you,

Sincerely,

Tabatha Blacksmith  
Compliance Coordinator  
360.586.8929



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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

WA Against Discrimination Everywhere Complaint.pdf  
176.45 KB

**Alice Fiman**

forwarded

*2 years ago (Thu, 28 Jan 2021 at 3:27 PM)*

Forwarded to: jcwceo@gmail.com

Jesse Wineberry,

I was provided information from the WADE treasurer noting you would be the respondent to this complaint. As this response was due January 6, 2021, I look forward to a response quickly. Please review the emails below and respond to the questions we have from and also the original complaint by **Tuesday, February 2, 2021**.

**To respond, please reply to this email.**

Thank you,  
Alice Fiman  
Compliance Officer  
alice.fiman@pdc.wa.gov  
360-586-4746  
toll free 877-601-2828

**Exhibit D**



**Alice Fiman**

replied

2 years ago (Mon, 22 Feb 2021 at 8:43 AM)

To:jcwceo@gmail.com

Cc:myricks@myricksllaw.com, abdi@garabeyfinancial.com

State of Washington

PUBLIC DISCLOSURE COMMISSION

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February 22, 2021

PDC Case: 82263

Washington Against Discrimination Everywhere (WADE)

P.O. Box 604

Renton, WA 98057

Sent electronically to abdi@garabeyfinancial.com; myricks@myricksllaw.com; jcwceo@gmail.com

**Notice of Case Status Review (Initial Hearing)**

Respondent: Washington Against Discrimination Everywhere (WADE)

Initial Hearing/meeting date: Tuesday, February 23, 2021

Time: 9 a.m.

Place: Remotely from Olympia Live Audio/Online Transmission

PDC Staff: Peter Lavalley, Executive Director, Public Disclosure Commission

Authority: RCW 42.17A.755(3) & WAC 390-37-071

This is to notify you that the Public Disclosure Commission (PDC) intends to open formal a investigation, and on the above date, PDC Staff will conduct a case status review, referred to as an initial hearing, concerning the complaint filed by Kan Qiu. The complaint alleges violations of RCW 42.17A.240 for failing to report and/or sufficiently describe expenditures and debt supporting a ballot proposition and for failing to report a contributor's name.

The initial hearing is not an adjudicative proceeding. It is conducted in accordance with WAC 390-37-071, and is intended to provide you with information concerning the investigative process, including possible alternatives to resolve the matter.

You are not required to participate in the hearing. Further, your failure to participate will not prejudice your rights concerning the investigative process, or any potential future adjudicative proceeding in the matter.

With the transmittal of this letter, I am including a link to the [PDC Enforcement Guide](#).

Your participation in the hearing is not required, but the PDC recommends participation whenever possible. Please contact PDC staff if you have questions or would like to participate remotely. Contact Alice Fiman, Compliance Officer, at [alice.fiman@pdcc.wa.gov](mailto:alice.fiman@pdcc.wa.gov) or 1-360-586-4746.

Sincerely,

*Electronically Signed*

*Peter Lavalley*

*PDC Executive Director*

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**Exhibit E**  
**Page 1 of 2**

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

**Myricks Law Group**

replied

2 years ago (Mon, 22 Feb 2021 at 6:42 PM)

To: "'PDC Support'" <pdcc@pdcc.wa.gov>

Dear Mr. Lavalley and Ms. Fiman:

*The following are the responses to the allegations raised in the complaint filed by Mr. Kan Qiu:*

**1) COMPLAINANT:** Alleges that Respondent WADE has violated RCW [42.17A.240](#) (6) which states,

*"Each report required under RCW [42.17A.235](#) (1) through (4) must be certified as correct by the treasurer and the candidate and shall disclose the following, except an incidental committee only must disclose and certify as correct the information required under subsections (2)(d) and (7) of this section:*

***(6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;"***

**RESPONDENT:** WADE has not violated RCW [42.17A.240](#) (6) because WADE has not made any transfer of funds to a candidate or a political committee. Therefore, WADE is not required by the PDC to report the name, address, amounts and dates of fund transfers which never transpired.

**2) COMPLAINANT:** Washington Against Discrimination Everywhere has failed to report the support and services it received for websites yeson1234.com and yeson1300.com, and I-1234 and I-1300 petitions design and printing cost.

**RESPONDENT:** RCW [42.17A.240](#) (7) requires a committee to report the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures.

Respondent's expenditures did not exceed the statutory \$50.00 aggregate reporting requirement. The purchase price of the yeson1234.com and yeson1300.com domains were \$1.00 each for the entire 2020-2021 calendar year. The I-1234 and I-1300 petitions were simple revisions of an existing petition, which cost a \$9.00 pizza for the volunteers who revised the petition.

Finally, there were no major printing costs this year due to the COVID-19 pandemic which required supporters to simply print their own petitions from our website and sign their names, as you can see and still do right here: [Sign Your Name! | I1300MANUELELLIS](#).

*The following are the responses to the questions posed by Ms. Tabatha Blacksmith in the email message dated December 28, 2020:*

The C-1PC report filed by WADE on 6/18/20 states that the committee supports “#1776 Washington Anti-Discrimination Act.” However, based on the most recent complaint, and a review of the website [yeson1300.com](http://yeson1300.com) (which redirects to [i1300manuelellis.com](http://i1300manuelellis.com)), WADE also appears to be supporting another initiative: I-300, the Manuel Ellis Washington Anti-Discrimination Act (WADA). The above-mentioned website says it was paid for by “Washingtonians Against Discrimination Everywhere.” As you can see, the committee name identified as the website’s sponsor is slightly different than the name under which WADE registered with the PDC.

ANSWERS ARE BELOW IN **BLUE** TEXT:

- Does WADE’s activities include supporting I-300? **NO. Washingtonians Against Discrimination Everywhere’s (WADE) activities DO NOT include supporting I-300. WADE’s activities include supporting only Initiative 1300 (I-1300). If so, will these activities continue in 2021? NO. The I-1300 campaign has ended.**
- Is the above-mentioned website sponsored (paid for) by WADE or is there a second, unregistered committee with a similar name? **YESON1300.com is sponsored by WADE. However, to date no funds have been paid for this website.**
- If the website belongs to WADE, why does the disclosure (sponsor identification) on its home page identify the committee as “Washingtonians Against Discrimination Everywhere” instead of its registered name? **Washingtonians Against Discrimination Everywhere (WADE) is the committee’s correct name. “Washington Against Discrimination Everywhere” contains a minor typo in the spelling of the word, Washingtonians.**
- The evidence provided for case 82263 includes a photo of a stack of paper petitions for I-300. **As stated above, Washingtonians Against Discrimination Everywhere’s (WADE) activities DO NOT include supporting I-300.**
- Did WADE purchase the paper petitions or receive them as an in-kind contribution? If so, what day was the expenditure made or in-kind contribution received? **WADE neither purchased the petitions in the photo nor received them as an in-kind contribution. Members of the Manuel Ellis family made those petitions available to members of the press at a press conference convened by the Manuel Ellis family, not WADE.**

Regards,

--

Toussaint L. Myricks, Esq.  
**Law Offices of Toussaint L. Myricks, PLLC**  
P.O. Box 1358  
Renton, WA 98057

tel: (425) 572-5187

Exhibit F  
Page 2 of 3

cel: (206) 701-4737  
fax: (206) 922-5628

LinkedIn: <https://www.linkedin.com/in/tmyricks/>

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**E-MAIL CONFIDENTIALITY NOTICE**

This communication and any files or documents transmitted herewith are confidential and privileged. They are intended for the sole use of the individual or entity to which it is addressed. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication is strictly prohibited. Moreover, any such inadvertent disclosure shall not compromise or waive the attorney-client privilege as to this communication or otherwise. If you have received this communication in error, please delete it and notify me immediately by email at [myricks@myrickslaw.com](mailto:myricks@myrickslaw.com).

[Alice Fiman](#)

replied

2 years ago (Tue, 23 Feb 2021 at 9:14 AM)

To:jcwceo@gmail.com

Cc:myricks@myricksllaw.com, abdi@garabeyfinancial.com

February 23, 2021

Sent electronically to abdi@garabeyfinancial.com; myricks@myricksllaw.com; jcwceo@gmail.com

Subject: Case Status Review (Initial Hearing) After Opening a Formal Investigation, PDC Case 82263.

Dear Washington Against Discrimination Everywhere (WADE):

After conducting a preliminary review and assessment of a complaint filed December 20, 2020 against WADE concerning alleged violations of RCW 42.17A.240 for failing to report and/or sufficiently describe expenditures and debt supporting a ballot proposition and for failing to report a contributor's name, PDC staff opened a formal investigation and held an initial hearing, (also referred to as a case status review) on February 23, 2021, pursuant to RCW 42.17A.755, and WACs 390-37-060 and 390-37-071.

At the hearing, it was noted the case status review is not an adjudicative proceeding and RCW 42.17A.755 provides PDC staff with additional tools to resolve complaints through the use of alternatives to full, formal adjudication, or referral to the Attorney General's Office, and I am encouraging you to work with staff on resolving this matter.

If you have questions, please contact Alice Fiman, Compliance Officer, by replying to the latest staff email concerning this matter or by calling 360-586-4746.

Sincerely,

*Electronically Signed  
Peter Lavallee  
PDC Executive Director*

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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

Initial Hearing Results Respondent PDC Case 82263 Washington Against Discrimination Everywhere (WADE).pdf  
160.39 KB

**Exhibit G**

**Alice Fiman**

replied

*2 years ago (Fri, 5 Mar 2021 at 10:46 AM)*

To: jcwceo@gmail.com

Cc: myricks@myricksllaw.com, abdi@garabeyfinancial.com

Toussaint L. Myricks,

In your response, you noted WADE (the Committee) **WADE's activities include supporting only Initiative 1300 (I-1300)**.

However, both the 2020 and 2021 registrations currently on file with the PDC list the Committee supporting 1776. Also, the 2020 Committee reported a deficit on its final C-4 for the 2020 election year. However, this deficit was not carried over and no reports were filed for 2021.

Please update the Committee's registration and financial data to reflect the supported initiative and also reflect the status of its financial obligations, including debts. Below are links to the information available on the PDC website.

If you have questions, please reply to the email. I look forward to your prompt attention to making these amendments and bringing the Committee into compliance.

[https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer\\_id=WASHI--057&election\\_year=2020](https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=WASHI--057&election_year=2020)

[https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer\\_id=WASHI--057&election\\_year=2021](https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=WASHI--057&election_year=2021)

To respond, please reply to this email.

Thank you,  
Alice Fiman  
Compliance Officer  
alice.fiman@pdc.wa.gov  
360-586-4746  
toll free 877-601-2828

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To respond, please reply to this email.

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

**Exhibit H**

**Alice Fiman**

replied

*2 years ago (Mon, 14 Jun 2021 at 10:22 AM)*

To:jcwceo@gmail.com

Cc:myricks@myricksllaw.com, abdi@garabeyfinancial.com

State of Washington

Public Disclosure Commission

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

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

June 14, 2021

Sent electronically to Washington Against Discrimination Everywhere (WADE)

Subject: Request for additional information letter concerning the complaint filed against Washington Against Discrimination Everywhere (WADE), PDC Case 82263

Jesse Wineberry and all WADE Committee Members and Committee counsel:

Public Disclosure Commission (PDC) staff is continuing to investigate the allegations listed in the complaint filed against Washington Against Discrimination Everywhere (WADE), a ballot measure committee registered and reporting with the PDC in 2020 and 2021, alleging violations of RCW 42.17A.240 by failing to accurately report expenditures made and debt incurred, including the detailed descriptions and for failing to identify a contributor.

In order to assist staff in the resolution of this case, please provide answers to the following staff questions listed below:

1. **What is the Committee's official name?**
2. **Has the registration with the PDC been updated per your response regarding the typo? If note, the Committee needs to make the update.**
3. **What is the status of the Committee's contributions and expenditures, including the outstanding \$25,000 debt?**
  1. **In the debt still outstanding?**
  2. **If not, how was it resolved/paid/forgiven?**
  3. **Was the resolution of the debt issue disclosed on any PDC report? If so, what date was the report filed?**
4. **What initiatives and/or referendums did WADE support?**
  1. **Please provide the campaign start date and end date of the initiatives and/or referendums WADE supported.**
  2. **You indicated in your response "I-1234 and I-1300 petitions were simple revisions of an existing petition." In the timeline, please indicate when revisions were made to each petition.**
  3. **Describe the revisions needed to the petitions. Did the Committee provide the instructions concerning how to revise the petitions?**
  4. **Describe the costs involved concerning initial work on the petitions. In addition, please indicate when and where the earlier versions of I-1234 and I-1300 petitions costs had been reported or disclosed.**



5. Concerning the statement that the revisions “cost a \$9.00 pizza for the volunteers who revised the petition”, please explain the pizza costs and how the pizza is redeemed or provided to the volunteer?

5. How was revision information communicated to “volunteers,” and where did you get the volunteer list? How did volunteers distribute petitions to gather signatures? If they used a list, where did the Committee get the list(s)?

6. Please provide copies of the Committee’s bank account records from the time of its opening to current date. Be note responses are public records so redact account number information.

Please provide a written response **no later than June 26, 2021**. To respond, reply to this email.

For your information, you are not required to provide a response, however failure to fully respond to staff’s request for information in order to resolve this matter, may result in an enforcement hearing before the full Commission. In addition, staff has the authority to issue a subpoena to compel WADE and WADE’s principals (including all Committee Officers) to answers staff’s questions.

Sincerely,

/s \_\_\_\_\_  
Electronically Signed by Alice Fiman  
PDC Compliance Officer

--

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.

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

**Lynn French, MHA, JD**

added a private note

a year ago (Wed, 1 Dec 2021 at 5:41 PM)

Notified to: "PDC Support" <pdcc@pdcc.wa.gov>

External Email

Attention: Alice Fiman

Dear Ms. Fiman,

This is to confirm that I along with the members of my family, Diane and Ajene French, as well as my business entity, Global Business Development, LLC, are not and have never been members of the Washington Against Discrimination Everywhere (WADE) committee. I, my business, and the members of my family are more than willing to provide notarized, sworn affidavits attesting to the fact that we were never members of WADE.

In regards to the following proposed statewide Initiatives, a summary of my involvement follows:

**Initiative 1000:** I and my family members were not sponsors, volunteers, or signature gatherers for this Initiative. My wife and I, however, were signers on one of the petition forms in support of the Initiative.

1. **Initiative 1776:** On or about June 5th, 2020, I agreed to be a Co-sponsor for this Initiative (**see email correspondence with the Secretary of State's Office at the bottom of this email**). The filing for this Initiative, however, was never successfully completed.
2. **Initiative 1234:** I agreed to be a Co-sponsor for this Initiative. The filing for this Initiative, however, was never successfully completed.
3. **Initiative 1300:** On or about October 28th, 2020, I agreed to be the Main Sponsor for this Initiative. The filing for this Initiative was successful.

I am happy to confirm in any manner that you deem appropriate and necessary, that I am not and have never been an officer of WADE; and never consented in writing or verbally to serving as an officer, and I have never been directly involved with WADE in any manner. In addition, the events that you mentioned in terms of signature gatherers, it is my understanding that this happened during the I-1000 campaign. I was not involved in the I-1000 campaign. Finally, I was reimbursed \$100 for the filings fees charged by the Secretary of State for I-1234 and I-1300. I have records to verify this information.

I am more than happy to cooperate with you in any manner relative to this concern. Please feel free to email or call at any time?

Lynn French

---

Prociv, Paul <Paul.Prociv@sos.wa.gov>

Fri 6/5/2020 8:45 AM

To:

- Lora-Ellen McKinney;
- Neary, Mark;
- Elections - Initiative Support

Cc:

**Exhibit J**  
**Page 1 of 2**

- Jesse Wineberry;
- ammanuelmamo7@gmail.com;
- LYNNDFRENCH@LIVE.COM;
- TerryI Ross

Dr.McKinney and co-sponsors,

I am writing all of you to confirm your co-sponsorships:

- \*Terry Ross
- \*Jesse Wineberry
- \*Amanuel Mamo
- \*Lynn French

Now that you are co-sponsors and with Dr.McKinney's wish to withdraw as prime sponsor, I ask that Dr.McKinney "reply all" to this email establishing:

1. The one **main sponsor** with whom all official communication will flow to and from the **Secretary of State's Office** after her withdrawal.
2. Confirm any edits the campaign's public contact information below (currently on the website)
3. Confirm her withdrawal as sponsor.

**Public Contact Information:**

3511 Columbia Street  
Seattle , WA 98122  
Phone: 425-503-5031  
Fax: 425-988-0249 ` ` `

**Paul Procriv** | VoteWA Petitions Management Analyst

**Office of the Secretary of State**

(360) 902-4177 (office) | (564)-999-1865 (cell)

[www.vote.wa.gov](http://www.vote.wa.gov)

The information in this email is provided as a service to the public and to our county election partners and is for informational purposes only. The contents should not be construed as, and is not intended to be, legal advice. You should contact your attorney for assistance navigating the law.

**Lynn D French, MHA, JD**

**President & CEO**

**Global Business Development, LLC**

**SBA 8(a), DBE, MBE, Certified**

**33530 1st Way S., Suite 102**

**Federal Way, WA 98003-7332**

**URL: [www.globalbdllc.com](http://www.globalbdllc.com)**

**Ofc: 253-797-2655, Fax: 253-252-7062**

**Cell: 206-786-2780**

**Abdirahman Mohamud**

replied

*a year ago (Tue, 7 Dec 2021 at 10:09 AM)*

To: "PDC Support" <pdcc@pdc.wa.gov>, jcwceo@gmail.com

Cc: myricks@myricksllc.com, lynn.french@live.com, diane.french@msn.com, ajenefrench@gmail.com,

lynn.french@frenchassociates.com, info@globalbdllc.com

+2 more

**External Email**

Dear Alice,

Thanks for your time to speak to me last week about this alleged violation. As the attached engagement letter highlights, I was hired to be the Treasurer of Washington Against Discrimination Everywhere (WADE) on June 1, 2020. The scope of my work and the fees for each month is also in the attached engagement letter.

The second paragraph in the Engagement Limitation section clearly states that my firm and I will not be responsible for any liabilities incurred and third party contracts entered into by WADE.

I was simply hired to record monthly transactions and report to PDC. I spoke to Mr. Jesse Wineberry several times on this issue and he assured me that it will be taken care of.

I also informed him in early 2021 to find another person to take over the Treasurer role due to my schedule. On April 20, 2021, I sent an email to ActBlue to inform them that I was no longer with WADE and transfer the account credentials to Jesse. Act Blue responded to my request on the same day, informing me that they removed my name from the account and transferred the account credentials to Jesse.

I also informed DocuSign on June 25, 2021 to follow up with Jesse on their invoices to WADE.

I tried to reach Jesse several times but he is not returning my calls or responding to my emails.

I am informing PDC that I am no longer associated with WADE.

I would appreciate if PDC could remove my name and contact information as a Treasurer of WADE.

Please let me know if you have any questions.

I appreciate your help on this matter.

Regards,

Abdi

Abdirahman Mohamud, CPA, CIA , CRMA

**Exhibit K**

Alice Fiman

replied

8 months ago (Fri, 22 Apr 2022 at 1:54 PM)

To:jcwceo@gmail.com

Cc:myricks@myricksllaw.com, ammanuel@insightstrategicpartners.com, jcwceo@gmail.com

After conducting a preliminary review and assessment of a complaint filed December 20, 2020 by Kan Qui, PDC staff opened a formal investigation and held an initial hearing, on February 23, 2021. PDC staff made numerous email and telephone requests for information to help resolve this matter.

Between December 2020 and January 27, 2022, staff PDC staff sent numerous emails to WADE Committee members. On December 7, 2021, Abdirahman Mohamud provided the PDC with documents noting his services were limited to bookkeeping and all other WADE activities were associated with others.

Since that time, there has been no response to staff's numerous phone and email requests.

PDC staff is making one last request for information. Please provide the previously requested information on PDC Case 82263 no later than the close of business on **May 4, 2022**. If you fail to provide the requested information by the above date, the PDC will refer this matter to the Office of the Attorney General to issue an investigative subpoena on behalf of the PDC and take all action necessary to enforce such subpoena.

If you have any questions please contact Alice Fiman, PDC Compliance Officer, by email at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov) attn: Case 82263.

Sincerely,

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

Electronically Signed Sean Flynn, General Counsel  
Public Disclosure Commission

--

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

Exhibit L

**Myricks Law Group**

added a private note

7 months ago (Mon, 23 May 2022 at 10:37 PM)

Notified to:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Ms. Fiman:

Responses to the questions you previously posed are provided below. In addition, a copy of a court order issued by the Thurston County Superior Court pertaining to a challenge to the ballot title and summary for I-1300 has also been attached for your records.

**1. What is the Committee's official name?**

**WASHINGTONIANS AGAINST DISCRIMINATION EVERYWHERE (WADE)**

- 2. Has the registration with the PDC been updated per your response regarding the typo? NO If note, the Committee needs to make the update. OK**
- 3. What is the status of the Committee's contributions and expenditures, including the outstanding \$25,000 debt? WADE ENDED AS A POLITICAL ACTION COMMITTEE, DECEMBER, 2020.**

- 1. In the debt still outstanding? YES**
- 2. If not, how was it resolved/paid/forgiven?**
- 3. Was the resolution of the debt issue disclosed on any PDC report? If so, what date was the report filed?**

**1. What initiatives and/or referendums did WADE support? INITIATIVE 1300**

- 1. Please provide the campaign start date and end date of the initiatives and/or referendums WADE supported. START DATE: OCTOBER, 2020/END DATE: DECEMBER, 2020.**
- 2. You indicated in your response "I-1234 and I-1300 petitions were simple revisions of an existing petition." In the timeline, please indicate when revisions were made to each petition. INITIATIVE REVISIONS WERE MADE WHENEVER THURSTON COUNTY SUPERIOR COURT JUDGES ORDERED REVISIONS TO BE MADE THE INITIATIVE.**
- 3. Describe the revisions needed to the petitions. REVISIONS ARE DESCRIBED IN ATTACHED THURSTON COUNTY SUPERIOR COURT ORDER NO. 20-2-02307-34. Did the Committee provide the instructions concerning how to revise the petitions? NO.**

4. Describe the costs involved concerning initial work on the petitions. THERE REALLY WERE NO COSTS INVOLVED IN THE INITIAL WORK ON THE PETITION. In addition, please indicate when and where the earlier versions of I-1234 and I-1300 petitions costs had been reported or disclosed. THERE WERE NO COSTS ASSOCIATED WITH ANY OF THE VERSIONS OF I-1300. ALL DRAFTING WAS DONE BY VOLUNTEERS.
5. Concerning the statement that the revisions “cost a \$9.00 pizza for the volunteers who revised the petition”, please explain the pizza costs and how the pizza is redeemed or provided to the volunteer? THE PIZZA WAS DONATED BY ONE OF THE VOLUNTEERS WHO SAID HE BOUGHT A PEPPERONI PIZZA FROM COSTCO FOR AROUND \$9.00.

5. How was revision information communicated to “volunteers,” and where did you get the volunteer list? THE REVISION INFORMATION WAS COMMUNICATED TO THE VOLUNTEERS ON THE SECRETARY OF STATE’S WEBSITE. THE VOLUNTEER NAMES AND CONTACTS WERE KEPT IN OUR CELL PHONE CONTACTS.

How did volunteers distribute petitions to gather signatures? VOLUNTEERS DID NOT DISTRIBUTE PETITIONS TO GATHER SIGNATURES. If they used a list, where did the Committee get the list(s)?

6. Please provide copies of the Committee’s bank account records from the time of its opening to current date. Be note responses are public records so redact account number information. BANK ACCOUNT WAS CLOSED IN 2020 WHEN COMMITTEE WAS UNABLE TO GATHER SIGNATURES DURING COVID PANDEMIC.

Please confirm successful receipt of this message by reply email.

Regards,

--

Toussaint L. Myricks, Esq.

**Law Offices of Toussaint L. Myricks, PLLC**

P.O. Box 1358

Renton, WA 98057

tel: (425) 572-5187

cel: (206) 701-4737

fax: (206) 922-5628

LinkedIn: <https://www.linkedin.com/in/tmyricks/>

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the taking of any action in reliance upon the communication is strictly prohibited. Moreover, any such inadvertent disclosure shall not compromise or waive the attorney-client privilege as to this communication or otherwise. If you have received this communication in error, please delete it and notify me immediately by email at [myricks@myrickslaw.com](mailto:myricks@myrickslaw.com).

PDC - I-1300 COURT ORDER (12-4-20).pdf  
605.67 KB



**Alice Fiman**

replied

*6 months ago (Wed, 22 Jun 2022 at 10:47 AM)*

To:jcwceo@gmail.com

Cc:myricks@myrickslaw.com

Per your response, you note the campaign has ended and the bank account has closed, however there remains a debt. Until the debt is cleared, the campaign has not ended and there continues to be a continuing reporting requirement to the PDC.

Please indicate when you will have the reports up to date and, if you are ending the Committee, how the debt was cleared.

Thank you,

To respond, please reply to this email.

Thank you,  
Alice Fiman  
Compliance Officer  
toll free 877-601-2828

**Alice Fiman**

forwarded

*6 months ago (Thu, 14 Jul 2022 at 12:16 PM)*

Forwarded to:myricks@myrickslaw.com

Thank you for taking the time to speak with me today. As noted in my June 22, 2022 email, until the debt is cleared, the campaign has not ended and there continues to be a continuing reporting requirement to the PDC. See the attached report regarding the debt.

To respond, please reply to this email.

Thank you,  
Alice Fiman  
Compliance Officer  
toll free 877-601-2828

110003528\_filed.pdf  
31.16 KB

SUMMARY, FULL REPORT  
RECEIPTS AND  
EXPENDITURES

C4  
(3/97)

PDC OFFICE USE  
110003528  
12-11-2020

Candidate or Committee Name (Do not abbreviate. Include full name)  
**Washington Against Discrimination Everywhere**

Mailing Address  
**P O Box 604**

City  
**Renton, WA**

Zip + 4 <b>98057</b>	Office Sought (Candidates)	Election Date <b>2020</b>
Report Period Covered	From (last C-4) <b>10/27/20</b>	To (end of period) <b>11/30/20</b>
		Final Report? Yes No <b>X</b>

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

RECEIPTS

\*See next page Yes No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	<b>\$2,000.01</b>
2. Cash received (From line 2, Schedule A) .....	\$	<b>\$100.00</b>
3. In kind contributions received (From line 1, Schedule B) .....		<b>\$0.00</b>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		<b>\$100.00</b>
5. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	<b>\$0.00</b>
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		<b>\$2,100.01</b>
9. Total pledge payments due (From line 2, Schedule B) .....	<b>\$0.00</b>	

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		<b>\$2,000.00</b>
11. Total cash expenditures (From line 4, Schedule A) .....		<b>\$100.00</b>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		<b>\$0.00</b>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		<b>\$100.00</b>
14. Loan principal repayments made (From line 2, Schedule L) .....		<b>\$0.00</b>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	<b>\$0.00</b>
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	<b>\$0.00</b>
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		<b>\$2,100.00</b>

**CANDIDATES ONLY**

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

Treasurer's Daytime Telephone No.:

CASH SUMMARY

18. Cash on hand (Line 8 minus line 17) .....	<b>\$0.01</b>
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	<b>\$25,000.00</b>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<b>(\$24,999.99)</b>

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

Candidate's Signature

Date

Treasurer's Signature

Date

**Abdirahman Mohamud, CPA**

**12/11/20**

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

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

Report Date

10/27/20

11/30/20

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
11/25/2020	\$100.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ **\$100.00**

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

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

### 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
11/25/20	LYNN FRENCH 33530 1st Way South - Suite 102 Federal Way, WA 98003		Reimbursement	\$100.00

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ **\$0.00**

Enter also on line 11 of C4 \$ **\$100.00**



**Myricks Law Group**

added a private note

4 months ago (Tue, 13 Sep 2022 at 5:06 PM)

Notified to:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

Dear Mr. Agina:

Thank you for your email.

According to my client, negotiations are ongoing between my client and Docusign regarding the \$25,000.00 debt. As you know, my client has fully complied with the PDC's rules which require the disclosure of the debt. My client will continue reporting the debt until the debt is retired.

On another note, we are recently in receipt of PDC General Counsel Sean Flynn's August 30, 2022 letter which inaccurately states the following:

*"Between December, 2020 and July 14, 2022, PDC staff sent numerous emails to WADE Committee members/attorney of record. On December 7, 2021, Abdirahman Mohamud provided the PDC with documents noting his services were limited to bookkeeping, while all other WADE activities were associated with other members of WADE. **Since that time, there has been no response to staffs' numerous phone and email requests.**" (Emphasis Added)*

General Counsel Flynn's statement is not true. I personally responded to Ms. Alice Fiman on behalf of my client on May 4, 2022, again on May 6, 2022 and finally on May 23, 2022 with the attached answers to all of the questions posed regarding my client's financial expenditures.

Please provide General Counsel Flynn a copy of our May 23, 2022 communications and encourage him to reply to us with a letter correcting the inaccurate allegation of my client's non-responsiveness. We have diligently responded to PDC inquiries and will continue to do so, until my client files its final PDC report.

Please confirm successful receipt of this message by reply email.

Regards,

--

Toussaint L. Myricks, Esq.

**Law Offices of Toussaint L. Myricks, PLLC**

P.O. Box 1358

Renton, WA 98057

tel: (425) 572-5187

cel: (206) 701-4737

fax: (206) 922-5628

LinkedIn: <https://www.linkedin.com/in/tmyricks/>

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Exhibit O

replied

To:jcwceo@gmail.com

Cc:myricks@myrickslaw.com

Counsel,

I am following up on the voicemail a left for you on Thursday, September 22, 2022. In the voicemail, I stated that I wanted to have a quick conversation regarding the \$25,000.00 debt to DocuSign, which you noted on your September 13, 2022, email to staff that it is still valid and stated: "According to my client, negotiations are ongoing between my client and DocuSign regarding the \$25,000.00 debt." In the same email, you also noted/stated: "My client will continue reporting the debt until the debt is retired."

Since you acknowledged, on behalf of your client, Jesse Wineberry/committee, that the debt is valid and "negotiations are ongoing regarding the debt," your client/committee needs to file one C-4 report for 2021 and one C-4 for 2022 carrying forward the debt owed to DocuSign. Those two reports need to be filed with the PDC before this case can be resolved.

Please let me know once these reports are filed so I can work on a disposition letter in this case. The two reports need to be filed by the close of business on **Friday, October 7, 2022.**

Let me know if you have any questions or concerns in the interim.

Thank you.

Sincerely,

Erick O. Agina  
Compliance Officer  
Public Disclosure Commission  
360.586.2869

—

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

added a private note

Notified to: "PDC Support" <pdcc@pdcc.wa.gov>

External Email

Dear Mr. Agina:  
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Please confirm successful receipt of this message by reply email.

Regards,

--

Toussaint L. Myricks, Esq.

**Law Offices of Toussaint L. Myricks, PLLC**

P.O. Box 1358

Renton, WA 98057

tel: (425) 572-5187

cel: (206) 701-4737

fax: (206) 922-5628

LinkedIn: <https://www.linkedin.com/in/tmyricks/>

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**Erick Agina**

replied

*a month ago (Wed, 23 Nov 2022 at 2:37 PM)*

To: jcwceo@gmail.com

Cc: myricks@myrickslaw.com

Counsel,

I'm following up on the email I sent you on September 27, 2022, requesting that your client file two C-4 reports for 2021 and 2022, depicting the \$25,000 debt owed to DocuSign as carry forward.

As of this writing, you have not responded to my email and your client has not filed the required statutory reports noted supra. You and your client have until the close of business on Friday, December 2, 2022, to file the two required reports. If staff does not receive both reports by the close of business on Friday next week, we will schedule a Brief Enforcement Hearing against your client before a presiding officer or a full hearing before the full Commission next month (December 2022).

Please see Chapter 390-37 WAC to familiarize yourself with the Enforcement Rules. Also, please review the Penalty Schedule (WAC 390-37-143) so that you and your client are in a good position to make an informed decision regarding the missing statutory reports.

Let me know if you have any questions.

Thank you.

Sincerely,

Erick O. Agina  
Compliance Officer  
Public Disclosure Commission  
360.586.2869

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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

**Exhibit Q**





STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112 Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

December 14, 2022

Jesse Wineberry  
10223 59<sup>th</sup> Ave S.  
Seattle, WA 98178

Also delivered electronically to Jesse Wineberry at [myricks@myrickslaw.com](mailto:myricks@myrickslaw.com)

**Subject: Washington Against Discrimination Everywhere (WADE) & Jesse Wineberry, PDC Case Number 82263**

The Public Disclosure Commission (PDC) is investigating a complaint filed on December 20, 2022, by Kan Qiu. The complaint alleges that Washington Against Discrimination Everywhere (WADE) and its principal committee member, Jesse Wineberry, may have violated RCW 42.17A.235 and .240 for failure to timely file Summary, Full Campaign Contribution and Expenditure (C-4) reports for 2021 and 2022, disclosing \$25,000 debt owed to DocuSign as a carry forward.

In accordance with RCW 42.17A.110 and RCW 42.17A.755, a Brief Adjudicative Proceeding (Brief Enforcement Hearing) has been scheduled to determine if you, Jesse Wineberry, violated RCW 42.17A.235 and .240 by failing to file Summary, Full Campaign Contribution and Expenditure (C-4) reports for 2021 and 2022, disclosing \$25,000 debt owed to DocuSign as a carry forward from the 2020 election cycle. Under the Brief Enforcement Hearing rules, the Presiding Officer has the authority to assess a civil penalty in accordance with the penalty schedule adopted by the Commission – WAC 390-37-143. A copy of the penalty schedule is enclosed/attached.

**BRIEF ENFORCEMENT HEARING NOTICE**

Date: Thursday, January 12, 2023  
Time: 1:00 p.m.  
Place: Remotely from Olympia  
Live Audio and Online Transmission  
Presiding Officer: Public Disclosure Commission  
Authority: RCW 42.17A and WAC 390

You are not required by law to attend the hearing. However, the Public Disclosure Commission recommends that respondents appear whenever possible.



## **PARTICIPATING VIA MICROSOFT TEAMS**

The Enforcement Hearing will be conducted remotely via video. The entire Hearing will be recorded. Some Commission members and staff may appear in-person at the PDC office in Olympia.

### **PLEASE READ THE ENTIRE INSTRUCTION Prior to joining the meeting**

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#### **How to participate remotely in the Washington State Public Disclosure Commission Meeting on January 12, 2023:**

Please note you may be prompted to download MS TEAMS App or use a supported browser: Microsoft Edge  or Chrome  for best performance.

#### **Participation Remotely via MS Teams**

On the date of the meeting (January 12, 2023) and at the designated agenda time (1p.m.), please join the Hearing using the below link:

[Click here to join the meeting](#) on your computer or mobile app

Please remember to **Mute** yourself and turn your **camera off** when you are not talking.

If you experience technical difficulties with the MS Teams participation after the meeting has started at 1:00 p.m., call the PDC's main number 1-360-753-1111 and staff will try to assist you.

If you have any questions about the hearing process prior to the hearing date, please contact Erick O. Agina by email at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

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

Erick O. Agina

Compliance Officer

Public Disclosure Commission

Enclosure