

On Mon, 22 Feb at 6:42 PM , Myricks Law Group wrote:
Dear Mr. Lavallee 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 (which redirects to 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,

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