Respondent Name

Washington Against Discrimination Everywhere (WADE) PAC

Complainant Name

Glen Morgan

Complaint Description

File a Formal Complaint - Glen Morgan

<u>Glen Morgan</u> reported via the portal (*Thu, 7 Sep 2023 at 12:14 AM*)

To whom it may concern,

It has recently come to my attention that Washington Against Discrimination Everywhere (WADE) PAC has violated a wider spectrum of Washington State's campaign finance laws (**RCW 42.17A**) than I originally realized. I will clarify these violations as follows:

1) Improperly and Illegally attempting to file a final report (Violation of RCW 42.17A.235 (11)(a))

A recent report filed by WADE PAC purports to indicate at the bottom that it is the committee's final report (See **PDC Report #110147410, attached for staff reference**). This report claims to cover January 1, 2023 to April 30, 2023.

However, according to **RCW 42.17A.235(11)(a)** it states:

"When there is no outstanding debt or obligation, the campaign fund is closed, the campaign is concluded in all respects, and the political committee has ceased to function and intends to dissolve, the treasurer shall file a final report."

This statute appears to be very clear, however as of today, it appears there is still very clearly at least one investigation into WADE PAC still active at the Public Disclosure Commission (See PDC Enforcement Case #121957, complaint attached for reference) and based on recent correspondence that I have uncovered in a public records request (see pgs 201 to 232 that I have also attached for staff reference), this clearly indicates that Toussaint Myricks (claiming to be an attorney) is still engaging in written and telephonic correspondence with PDC staff on that case. Assuming Mr. Myricks typically charges for such correspondence in relation to legal matters, this would be reportable as an in-kind contribution (assuming others are paying for his legal services), or perhaps as a debt (if he is running up a legal bill on behalf of this shady PAC), or even just in-kind contribution if he is donating his expensive legal expertise to WADE PAC as pro bono charity work. While Mr. Myrick's activity is ongoing (and, for the record, illegally not reported on any C4 yet filed), filing a final C4 would appear to be improper and illegal for this PAC at this time.

2) Misreporting date of \$25,000 in-kind contribution, late reporting of same (by years), and failing to properly describe (Violation of RCW 42.17A.240)

By the treasurer's own admission on the C4 (**PDC Tracking C4 Report#110133101**, attached for staff **reference**), this \$25,000 in-kind contribution was received on 7/31/2020, but was illegally and apparently falsely reported as being "received" on 1/1/2021.

If, in fact this crew had actually "received" this "in-kind" contribution on 1/1/2021, then the C4 report where it was disclosed was approximately two years late (covering calendar years 2021, 2022 until it was finally, belatedly, and with absurd pressure from the PDC to convince these guys to actually be honest and report the truth for a change – late reported on January 12, 2023). If any of this final version of this large, in-kind

contribution is accurate now, it took two years to report, which is a significant violation of the statute on its own.

However, dissatisfied with just flagrantly violating the law by concealing the truth for years, this crew decides to conceal what the heck this \$25,000 thing was. Seriously, what the heck was this "in-kind" contribution? There are literally no details provided despite the clear requirement in WAC 390-16-037 to do so. What the heck "service" or "good" was provided "in-kind" for \$25,000? This is just campaign basic 101 reporting, and still, after years of drama and dragging it out, this large, shady PAC is still concealing the truth from the public about this.

3) Falsifying Officers Identities and apparently stealing true identities of non-officers and then representing them as officers (Violation of RCW 42.17A.205(2)(c))

This is not a violation I catch a PAC (even the most dishonest and shady groups) committing very often. I don't know why I am shocked about this, judging everything else this crew has been caught doing, but this one still stands out a bit to me as a uniquely illegal and particularly nasty violation of Washington's campaign finance laws because it requires the organizers of this PAC to just falsify a document from inception and drag innocent people into the mud of campaign finance violations with the rest of this crew. Innocent people are harmed by this type of activity, yet this appears to be commonplace behavior by these guys.

Dr. Lynn French was improperly named as an officer of this PAC. This was made very clear in an email uncovered in a recent public records request I sent to the PDC (See pg. 181, attached for reference). I will quote from her email:

"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."

It isn't clear why WADE PAC would do this to innocent people who don't want to be associated with their illegal activity, but this is clear evidence they did it anyway.

4) Failure to timely/accurately update C1PC and update change of officers (Violation of RCW 42.17A.205)

In addition to all the other violations this PAC seemed intent to commit while plaguing our state, their treasurer, Abdirahman Mohamud, CPA indicated in writing that he resigned as campaign treasurer on or around early 2021. However, no amended C1PC form was filed indicating who the new treasurer actually was after that point. Based on the correspondence with the PDC ongoing to this day, it appears that Toussaint L. Myricks may have taken on this role.

I have attached the C1PC that is currently on file for this PAC, and it is substantially out of compliance with the law. Dr. Lynn French is still listed (falsely) as an officer, even though she never was. The Treasurer resigned years ago as indicated in the email I've attached, and Myricks has not properly identified himself as the guy doing the dirty work for this group and acting as treasurer as well. Clearly this is way, way out of compliance and this group needs to file an updated C1PC to become minimally compliant in this way.

5) Failure to report services from treasurer as in-kind contributions (Violation of RCW 42.17A.235, .240)

As I was trying to sort out who was actually running this PAC, and reviewing the records request, it became clear that this crew was concealing the expenditures related to the treasurer in their expenditure (C-4)

reports. As you will note in the same email (page 183 of the recent records request I received, I've attached this for staff reference), I will quote:

"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."

This information from this treasurer indicates that he did receive payment for his services (he quoted them – although we don't have a copy of those fees in the records request documents). However, these fees were not disclosed as either in-kind contributions or unpaid debt or anything else. I'm just presuming based on the shady off-books and illegal activity by this group that the most likely representation of this information would be as an in-kind contribution and this PAC must go back and correct this information so that the public can know the truth here.

6) Failure to accurately identify treasurer on C4 reports. Filing sworn, legal documents under false aliases to the Public Disclosure Commission (Violation of RCW 42.17A.145)

It has actually been years since I last caught someone falsely representing someone else and filing reports (sworn, legal documents) to the Public Disclosure Commission. I believe the last one was in **PDC Enforcement Case #15599**, which of course, the Washington State Attorney General brought as a lawsuit and found the person doing this personally liable at the time.

As indicated above, the original admitted treasurer for this WADE PAC named Abdirahman Mohamud, CPA) reported that he resigned sometime before April 2021. However, his name appears at the treasurer who is certifying the reports subsequent to this resignation (**See PDC Reports #110133101, #110147410, and #110147409 as examples**).

This is clearly improper, illegal and a clear example of lawbreaking committed by this crew. In this specific violation, it may be more accurate to recognize that these documents appear to have been filed, falsely, using the identity of the resigned treasurer by Toussaint L. Myricks, who claims he is an attorney. It would be worthwhile to note that attorneys are not exempt from following the law, and as officers of the court, they should be fully aware of the legal liability they incur personally by falsely representing in official sworn documents filed with the state that they are someone else. This is very troubling and exceptionally illegal, and a clear violation of the law.

7) Failure to properly account for expenditures. Vanishing campaign funds without explanation (Violation of RCW 42.17A.240)

The last report covering the 2020 campaign was filed on 11/30/2020 (See **PDC Report #110003528, attached for staff reference**). In that report, this shady PAC reported they had exactly \$.01 left in their bank account (See line 18). This was their cash on hand balance. However, the next report covering all of calendar year 2021 was filed on 1/12/2023 and no subsequent expenditures were reported or disclosed.

This would tend to indicate that there was still a \$0.01 balance. Yet, despite this, the report actually indicates a \$0.00 balance. Where did the money go? Was the line 18 balance reported back in 2020 even remotely accurate in the first place?

I strongly recommend to the PDC that the only way you can ever resolve this question is to subpoen the bank records and match them to the reported amounts for the respective report years. It is the only way to be sure.

8) Multiple reports have been filed late (Violation of RCW 42.17A.235, .240)

This PAC and the crew that bumbled around using it as cover for their illegal actions certainly spent most of their time breaking the law, but in the interest of being semi-thorough, or at least as thorough as it is possible to be considering the information likely still concealed from the public and the inaccurate information reported to the public by this crew, I felt inclined and compelled to point out that multiple reports, when filed, as inaccurate as they may be were also late.

Example #1 – C4 report covering the month of April 2023 was filed 8 days late (PDC Report #110147410)

Example #2 - C4 report covering all of 2022 was filed at least 8 days late (PDC Report #110147409)

Example #3 – No C4 report has yet been filed to cover the time period of December 2020, yet clearly there was some activity then (in-kind or just vanishing funds)

9) Failure to provide complete details and information (name and address of the vendor – law firm – from which in-kind contribution services (Violation of RCW 42.17A.240)

Clearly, as we have discussed in this complaint and the previous complaint still under investigation with this crew, the name, and address of the vendor – the law firm – from which in-kind contributions services have been procured has not been reported on the C4 report in the in-kind contribution section pursuant to agency guidance. They should be able to get this one right (See **PDC C4 Report #110147410, attached for staff reference**).

I'm optimistic that with enough attorney's involved, some subpoenas of bank records, and a bit of legwork, this PAC can finally, after long last get back into some type of compliance with Washington State's campaign finance laws. I can tell from the correspondence I found in the recent records request I received that this may be something this group does not want to do, but sometimes following the law takes precedence over their schemes and plans to hide the truth from the public.

I'm very concerned that this organization has fumbled along for such a long time so far out of compliance, but there is no time like the present to get them back on the path to becoming legal, at long last.

Let me know if you need anything else from me on this one.

Best Regards,

Glen Morgan

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

This PAC has never been honest or truthful with the public. Their violations just get worse every time I look at them. However, perhaps they can at least go back and correct all the reports that are currently fake or false or misleading. This will be a good start for transparency and truth reporting to the public. I rarely catch someone falsely filing documents in other people's names and falsely representing officers that don't exist, but even these issues can be corrected.

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

All attached as exhibits

List of potential witnesses with contact information to reach them

Jesse Wineberry is worth finding - even if he appears to be dodging everyone else's phone calls. This shady attorney who seems to be continuing the lawbreaking is worth finding. The subpoenas for the bank records seem critical to even start to get to the bottom of what happened her

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE 110003528

12-11-2020

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

ashington Against Dis	crimination Ex	verywhere	9					
Mailing Address O Box 604					City Renton,	WA		
Zip + 4 8057	Office Sought (Candid	dates)	Election Date	*F	*For PACs, Parties & Cauc this report period, did the commi			
Report Period From (last C-4	To (end	I of period)	Final Report?					idered a contribution)
Covered 10/27/20		30/20	Yes No X			r opposing a stat		
RECEIPTS	-		1.00	 *c	See next pa	200	Yes	No
Previous total cash and in kin (if beginning a new campaign	d contributions (From li or calendar year, see i	ine 8, last C-4 instruction boo) bklet)		·			\$2,000.01
2. Cash received (From line 2, S	Schedule A)				\$	\$100.00		
3. In kind contributions received	(From line 1, Schedule	e B)				\$0.00		
4. Total cash and in kind contrib	utions received this per	riod (Line 2 plu	us 3)					\$100.00
5. Loan principal repayments ma	ade (From line 2, Scheo	dule L)				\$0.00		
6. Corrections (From line 1 or 3,	Schedule C)		Show + or	or (-)		\$0.00		
7. Net adjustments this period (0	Combine line 5 & 6)					Show + or (-)		\$0.00
8. Total cash and in kind contrib	utions during campaigr	n (Combine lin	es 1, 4 & 7)					\$2,100.01
9. Total pledge payments due (F	From line 2, Schedule E	3)	\$0.00					
EXPENDITURES	d avaandituraa (Francii	ing 17 loot C	4)					
Previous total cash and in kin (If beginning a new campaign	or calendar year, see	instruction boo	oklet)					\$2,000.00
11. Total cash expenditures (From	m line 4, Schedule A)					\$100.00		
12. In kind expenditures (goods &	services) (From line 1	, Schedule B)				\$0.00		
13. Total cash and in kind expend								\$100.00
14. Loan principal repayments ma	ade (From line 2, Scheo	dule L)				\$0.00		
15. Corrections (From line 2 or 3,	Schedule C)		Show + or	or (-)		\$0.00		
16. Net adjustments this period (0	Combine lines 14 & 15)					Show + or (-)		\$0.00
17. Total cash and in kind expend								\$2,100.00
CANDIDATES ONLY Won Lost U		CASH SUMM 18 Cash on h	ARY and (Line 8 minus line	(17 م				\$0.01
			equal your bank account ba					
Primary election		19. Liabilities:	(Sum of loans and de	debts o	owed)			\$25,000.00
Treasurer's Daytime Telephone N		20. Balance (S	Surplus or deficit) (Line	ne 18 r	minus line	19)		(\$24,999.99)
CERTIFICATION: I certify that the inf	ormation herein and on ac	companying sch	hedules and attachments	ts is tru	ue and corre	ct to the best of my	knowledae	
Candidate's Signature	Date	, , , , ,	Treasurer's Signatu				3-	Date
			Abdirahman M	Moha	amud, C	PA		12/11/20

CASH RECEIPTS AND EXPENDITURE

SCHEDULE

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

Report Date

					10/27/20	11/30/20
1. CASH RECEIPTS	(Contributions) whic	h have been reported on	C3. List each dep	osit made since last C4 r	report was submitte	ed.
Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
11/25/2020	\$100.00					
2. TOTAL CASH REC	EIPTS			Enter als	so 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:

- 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;
- When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and 2)
- 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..
- 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
			Total from attached non	oo ¢ do oo

Total from attached pages

\$0.00

Enter also on line 11 of C4

\$100.00

IN KIND CONTRIBUTIONS, PLEDGES, ORDERS, DEBTS, OBLIGATIONS

SCHEDULE TO C4 B

3

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

Report Date

10/27/20 11/30/20

3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

DOCUSIGN 221 Main Street - Suite 1550 San Francisco, CA, 94106 DOCUSIGN 221 Main Street - Suite 1550 San Francisco, CA, 94106 Documents Signatures Online handwritte signatures	Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR Descr	iption of Obligation
	7/31/2020	221 Main Street - Suite 1550	25000.00	online l signatur	nandwritten res
TOTAL THIS PAGE		TOT:: -:::0 =:	05		



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@garabeyfinancial.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

Description

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

State of Washington Initiative or Referendum 2020

Attachments

Name

Abdirahman Mohamud

replied

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

To:"PDC Support" pdc@pdc.wa.gov>, jcwceo@gmail.com
Cc:myricks@myrickslaw.com, lynndfrench@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



Lynn French, MHA, JD

added a private note

a year ago (Wed, 1 Dec 2021 at 5:41 PM)
Notified to:"PDC Support" <pdc@pdc.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?

Lymminench			

Prociv, Paul <Paul.Prociv@sos.wa.gov> Fri 6/5/2020 8:45 AM

To:

Cc:

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

Exhibit J Page 1 of 2



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

Washington Against Discrimination Everywhere (WADE) Washington Against Discrimination Everywhere -P O Box 604 Coverage: 01/01/2021 to 12/31/2021

Final report: No

Report number: 110133101 Reporting year: 2021

Date submitted: 01/12/2023

RECEIPTS

Renton, WA 98057

1. Previous total cash and in-kind contributions (last C4 line 8).		\$0.00
2. Cash received (Schedule A line 1).	\$0.00	
3. In-kind contributions received (Line 1 schedule B).	\$25,000.00	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$25,000.00
5. Loan principal repayments made (Line 2 schedule L).	\$0.00	
6. Corrections (Lines 1 or 3 schedule C).	\$0.00	
7. Net adjustments this period (Lines 5 + 6).		\$0.00
8. Total cash and in-kind contributions during campaign (Lines 1 + 4 + 7).		\$25,000.00
9. Total pledge payments due (Line 2 schedule B).	\$0.00	
EXPENDITURES		
10. Previous total cash and in-kind expenditures (Last C-4 line 17).		\$0.00
11. Cash expenditures (Line 3 schedule A).	\$0.00	
12. In-kind expenditures (Line 1 schedule B).	\$25,000.00	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$25,000.00
14. Loan principal repayment made (Line 2 schedule L).	\$0.00	
15. Corrections (Lines 2 + 3 schedule C).	\$0.00	
16. Net adjustments this period (Lines 14 + 15).		\$0.00
17. Total cash and in-kind expenditures during campaign (Lines 10 + 13 + 16).		\$25,000.00
CASH SUMMARY		
18. Cash on hand (Lines 8 - 17)		\$0.00
Line 18 should equal your bank account balance(s) plus your petty cash balance.		
19. Liabilities: (Sum of loans and debts owed)		\$0.00
20. Balance (Lines 18 - 19)		\$0.00

I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Abdirahman Mohamud, CPA - 01/12/2023

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
01/01/2021	DOCUSIGN 221 Main Street, Suite 1550 , San Francisco, CA 94106		In-kind contribution	Fair market value: \$25,000.00 Aggregate total (N): \$25,000.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

First debt incurred	Recipient/Vendor	Description	Balance owed (as of this reporting period)
07/31/2020	DOCUSIGN 221 Main Street, Suite 1550, San Francisco, CA 94106		\$0.00

Report notes/attachn							
In-Kind Contribution	from Year 2020 was	incorrectly	reported as debt.	Reporting	in Year 20	21 as In-Kind (Contribution.

6 months ago (Tue, 21 Mar 2023 at 8:51 AM)



Jesse Wineberry,

Staff is following up on the status of the response that was due on Wednesday last week. Please submit a response by the close of business on Monday, March 27, 2023.

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

Myricks Law Group replied

5 months ago (Mon, 27 Mar 2023 at 8:40 PM)



To: "'PDC Support'" <pdc@pdc.wa.gov> Cc: jcwlawman@yahoo.com

External Email

Dear Mr. Agina:

I write in response to the email notification you have sent to Mr. Wineberry (see below). The complaint filed by Mr. Morgan on February 16, 2023, is completely and flatly baseless and incorrect on its face. The services rendered by my firm to the WADE campaign were NOT services rendered as "in-kind" contributions. Once payment is made, both the \$100 penalty and the legal fee for professional services will be promptly reported on the appropriate reporting form. Therefore, we ask that this complaint be dismissed.

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/

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.

5 months ago (Fri, 31 Mar 2023 at 7:35 AM)



Counsel,

Staff is in receipt of the response you submitted on behalf of your client. Please file the necessary report(s) showing payments/expenditures made by you client to your law firm for professional legal services.

Please file the report(s) no later than Friday, April 7, 2023. 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

Erick Agina added a private note

5 months ago (Thu, 20 Apr 2023 at 4:25 PM)



Spoke with attorney Myricks at (206) 701-4737. He noted that he was not involved in the ballot process and any fees for legal services owed to him is for his work defending the Committee/Jesse Wineberry against complaint 82263. He also noted that the Committee has "closed operations"/filed a final C-4, and any monies owed to him for legal services provided in defense of PDC complaint 82263 will be paid to him by Jesse Wineberry.

Myricks Law Group replied

4 months ago (Thu, 27 Apr 2023 at 5:26 PM)



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

External Email

Mr. Agina:

For the record, no in-kind legal services were provided in support of a ballot proposition.

I will await contact from the staff person you mentioned today who can help me prepare and submit a final C-4 report for the WADE campaign committee.

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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4 months ago (Mon, 1 May 2023 at 7:43 AM)



Counsel,

A filer assistance staff has been assigned to your case to help you file/amend the committee's C-4 report. Please let me know if you do not hear from someone by the close of business tomorrow.

Thank you.

Sincerely,

Erick O. Agina Compliance Officer Public Disclosure Commission 360,586,2869

--

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To respond, please reply to this email.

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Myricks Law Group replied

4 months ago (Mon, 1 May 2023 at 7:59 AM)



To: "PDC Support" <pdc@pdc.wa.gov>, jcwlawman@yahoo.com

External Email
Mr. Agina:
Please direct all communications only to me as Mr. Wineberry is neither a party nor a client. The client is the WADE campaign committee.
I have been in contact with Ashley Carlson from your office and she and I will work together tomorrow afternoon to prepare and file the final C-4 form.
Sent from my T-Mobile 5G Device
Original message

Myricks Law Group replied

4 months ago (Wed, 3 May 2023 at 10:08 AM)



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

External Email

Mr. Agina:

Thank you for your time this morning. I greatly appreciate the helpful clarifications you provided during our call.

First, the law firm had no involvement in the campaign or the ballot process led by WADE when it was an active campaign committee. Hence, no legal services were provided on an in-kind basis in furtherance of the prior efforts of the WADE campaign committee as alleged by Mr. Glen Morgan in complaint 121957.

Second, the source of funding for (a) payment of the penalty imposed by the PDC upon conclusion of the adjudicative proceeding held on January 12, 2023, in response to complaint 82263, and (b) the legal fees paid for the representation provided during this proceeding were provided by several private donors not the WADE campaign committee.

As we discussed, please confirm by reply email today that the PDC has officially closed its records on the WADE campaign committee as of January 12, 2023, the date of filing of the last C-4 report. Please also confirm that this email finalizes our required response to complaint 121957.

Best 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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4 months ago (Thu, 4 May 2023 at 11:52 AM)



To: myricks@myrickslaw.com

Counsel,

I just left you a voicemail. Please call me back at your earliest expediency.

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

Erick Agina added a private note

4 months ago (Fri, 5 May 2023 at 1:42 PM)



Spoke w/attorney Myricks a few minutes ago. He is amenable to filing the required two C-4 reports. He will wait for contact from filer assistance team and go from there.

Myricks Law Group replied

4 months ago (Fri, 5 May 2023 at 1:51 PM)



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

External Email

Mr. Agina:

Thank you for taking my call today. As you stated today, I will await contact from the appropriate person in the filer assistance unit who can provide assistance to me in completing and submitting the Form C-4 for Year 2022 and a final Form C-4 for Year 2023.

--

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

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4 months ago (Tue, 9 May 2023 at 7:47 AM)



To: myricks@myrickslaw.com

Counsel,

Please give me a call when you have time this morning. I have just one more thing that I need to clarify with you.

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

4 months ago (Thu, 11 May 2023 at 6:49 AM)



To: myricks@myrickslaw.com

Counsel:

Thank you for talking with me yesterday. As I noted during our conversation, staff will need the names of the donors and the amount donated by each donor (for the in-kind donation received by WADE for payment of legal services rendered by your law firm and the \$100 civil penalty) to be able to help the Committee file the required C-4 report(s). Please review RCW 42.17A.235 and RCW 42.17A.240.

Please file the required report(s) no later than Monday, May 15, 2023.

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

Thank you.

Sincerely,

Erick O. Agina Compliance Officer Public Disclosure Commission 360.586.2869

_

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To respond, please reply to this email.

Washington Public Disclosure Commission http://www.pdc.wa.gov 1,360,753,1111

4 months ago (Fri, 12 May 2023 at 6:25 PM)



To: myricks@myrickslaw.com

Counsel:

The Public Disclosure Commission (PDC) staff plans to open a formal investigation in this matter to properly sort out the issues raised regarding the inkind contributions received by WADE for legal services rendered by your law firm and for payment of the civil penalty imposed by the Commission upon conclusion of a prior adjudicative proceeding against WADE (PDC Case 82263).

Attached herein is a notice for an Initial Hearing (Case Status Review) scheduled for Thursday, May 18, 2023, at 1:30 PM. Staff will cancel the initial hearing if you are able to file the required C-4 reports with the names of the contributors, including how much each contributor contributed individually by the close of business on Wednesday, May 17, 2023.

Please read the attached notice and let me know if you have questions or if you would like to participate by telephone. Please note that this is not an enforcement hearing, it is a case status review that is required when an investigation is opened.

I am including links to the PDC Enforcement Guide to the rules concerning enforcement, including initial hearings.

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.

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121957 Washington Against Discrimination Everywhere - Initial Hearing (Case Status Review) Notice.pdf 128.49 KB



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: <u>pdc@pdc.wa.gov</u> • Website: <u>www.pdc.wa.gov</u>

May 12, 2023 PDC Case: 121957

Toussaint L. Myricks, PLLC P.O. Box 1358 Renton, WA 98057

Sent electronically to Toussaint Myricks, Esq at myricks@myrickslaw.com

Notice of Case Status Review (Initial Hearing)

Respondent: Washington Against Discrimination Everywhere (WADE)

Hearing/meeting date: Thursday, May 18, 2023

Time: 1:30 PM

Place: Remotely by Telephone/Microsoft Teams

PDC Staff: Peter Lavallee, 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 a formal investigation, and on the above date, PDC Staff will conduct a case status review, referred to as an Initial Hearing, concerning a complaint filed on February 16, 2023, by Glen Morgan. The complaint alleges that your client, WADE, may have violated RCW 42.17A.235 and .240 for failure to disclose in-kind contribution(s) received by WADE for the legal services rendered by your law office and for payment of the civil penalty imposed by the Commission upon conclusion of a prior adjudicative proceeding against WADE (PDC Case 82263).

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.

Washington Against Discrimination Everywhere (WADE) PDC Case 121957 Case Status Review Notice (Initial Hearing Notice) Page 2

With the transmittal of this notice, I am including a link to the <u>PDC Enforcement Guide</u>, and a link to the agency's recently adopted <u>emergency rules concerning enforcement</u>, including case status reviews (initial hearings)

If you would like to participate by telephone, please contact Erick Agina, Compliance Officer, by replying to the email to which this letter is attached.

Let me know if you have questions.

Sincerely,

Peter Lavallee PDC Executive Director



Myricks Law Group replied

4 months ago (Wed, 17 May 2023 at 7:15 PM)



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

External Email

Mr. Agina:

In your email dated May 12, 2023, you requested that I provide the following information:

- a. The names of private donor contributors;
- b. The amount of contribution made by each contributor; and
- c. The submission of the final set of C-4 reports for 2022 and 2023.

Per your request, attached is the complete list of the private donors who provided funds to offset the legal fees that were required to respond to complaint 82263 and to provide representation for WADE in the enforcement hearing which was held of January 12, 2023. The list includes the name, address, amount of donation, and the date of donation from each donor as required pursuant to RCW 42A.17.240. Also, I wish to again reconfirm that the law firm had no involvement in the campaign or the ballot process led by WADE when it was an active campaign committee.

As you instructed, I contacted the Filer Assistance Unit for help in filing the necessary C-4 reports this afternoon. However, the person I spoke with today, Ms. Ladelle Fuquay, had to leave for the day but asked that I contact her tomorrow morning at 7:30 am so that she could help me complete the filings you have requested. I will be in contact with Ms. Fuquay at that time tomorrow morning and will send you an email message confirming the filing of these reports along with the requested list of private donors.

Once these filings have been completed, please confirm (a) that the Case Status Review which was scheduled for May 18, 2023, at 1:30 will be canceled and (b) that the PDC has officially closed its records on the WADE campaign committee as of the date of filing of these last C-4 reports on May 18, 2023.

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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PRIVATE DONOR LIST.docx 13.17 KB

LIST OF PRIVATE DONORS

Curtis Connor 4952 Underwood Ave Baton Rouge, LA 70805 Occupation: Construction

Donation: \$250.00 Date: 4/16/23

Richelle Harrison, Esq. 429 Kenyon Street, N.W. Washington, D.C. 20010 Occupation: Retired Donation: \$500.00 Date: 4/12/23

George Waters 4352 Floral Lane Marianna, FL 32446 Occupation: Retired Donation: \$100.00 Date: 4/17/23

Marian Waters 4352 Floral Lane Marianna, FL 32446 Occupation: Retired Donation: \$100.00 Date: 4/17/23

Tana Yasu 6033 California Avenue, SW Seattle, WA 98136

Occupation: Community Outreach

Donation: \$50.00 Date: 4/18/23

Myricks Law Group replied

4 months ago (Thu, 18 May 2023 at 10:01 AM)



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

External Email

Mr. Agina:

I write to confirm that the C-4 reports for 2022 and 2023 have been successfully filed on behalf of the WADE campaign committee along with the list of private donors. As noted in my previously sent email message (shown below), please confirm by reply email that:

- (a) the Case Status Review which was scheduled for today at 1:30 will be canceled;
- (b) the PDC has officially closed its records on the WADE campaign committee as of the date of filing of these last C-4 reports on May 18, 2023; and
- (c) our responses to your requests now finalize and resolve all outstanding issues associated with Complaint 82263 and Complaint 121957.

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

4 months ago (Thu, 18 May 2023 at 11:42 AM)



To: myricks@myrickslaw.com

Counsel:

I just left you a voicemail stating that we need confirmation from you that Mr. Abdirahman Mohamoud, CPA, is still WADE's treasurer. The reports you filed this morning for WADE show Mr. Mohamoud as the one certifying the reports. However, based on our investigation in case 82263, which concluded on or about January 31, 2023, Mr. Mohamoud sent a formal email to the PDC noting that that he was no longer associated with WADE. That was on December 7, 2021. See below:

Abdirahman Mohamud

replied

a year ago (Tue 7 Dec 2021)

To: "PDC Support" <pdc@pdc.wa.gov>, jcwceo@gmail.com Cc:myricks@myrickslaw.com, lynndfrench@live.com +6 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

WADE engagment letter.pdf 1.83 MB

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

Erick Agina replied

4 months ago (Fri, 19 May 2023 at 9:13 AM)



To: myricks@myrickslaw.com

Counsel:

Attached please find the results from the initial hearing that was held yesterday, May 18, 2023, at 1:30pm.

Thank you.

Sincerely,

Erick O. Agina Compliance Officer Public Disclosure Commission 360.586.2869

--

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To respond, please reply to this email.

Washington Public Disclosure Commission http://www.pdc.wa.gov 1,360,753,1111





121957 Washington Against Discrimination Everywhere Initial Hearing Results .pdf 102.16 KB



State of Washington PUBLIC DISCLOSURE COMMISSION

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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

May 19, 2023

Sent electronically to Toussaint Myricks, Esq, on behalf of Washington Against Discrimination Everywhere at myricks@myrickslaw.com

Subject: Initial Hearing (Case Status Review) After Opening a Formal Investigation, Washington Against Discrimination Everywhere, PDC Case 121957

Dear Washington Against Discrimination Everywhere:

After conducting a preliminary review and assessment of the complaint filed on February 16, 2023, by Glen Morgan, the Public Disclosure Commission (PDC) staff opened a formal investigation and held an Initial Hearing (also referred to as a Case Status Review), on May 18, 2023, pursuant to RCW 42.17A.755, and WACs 390-37-060 and 390-37-071.

At the hearing it was noted that the Initial Hearing (Case Status Review) is not an adjudicative proceeding, and that 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 Erick Agina, Compliance Officer, by replying to the email to which this letter is attached.

Sincerely,

/s/ Peter Frey Lavallee

Peter Frey Lavallee, Executive Director



Myricks Law Group reported via email

4 months ago (Thu, 18 May 2023 at 1:54 PM)



To: PDC <pdc@pdc.wa.gov> **Cc:** officeadmin@pdc.wa.gov

Treasurer for Non-Existent Committee

ıvır. Agına:

As you know, WADE is not an existing political campaign committee. Washington state law does not address the unique situation where committee financial reports are filed after a candidate or political committee no longer exists. As you will see below, RCW 42.17A.210 defines a "treasurer" only within the context of an <u>active</u> candidate or political committee:

Treasurer.

- (1) Each candidate, within two weeks after becoming a candidate, and each political committee, at the time it is required to file a statement of organization, shall designate and file with the commission the name and address of one legally competent individual, who may be the candidate, to serve as a treasurer.
- (2) A candidate, a political committee, or a treasurer may appoint as many deputy treasurers as is considered necessary and shall file the names and addresses of the deputy treasurers with the commission.
 - (3)(a) A candidate or political committee may at any time remove a treasurer or deputy treasurer.
- (b) In the event of the death, resignation, removal, or change of a treasurer or deputy treasurer, the candidate or political committee shall designate and file with the commission the name and address of any successor.
- (4) No treasurer or deputy treasurer may be deemed to be in compliance with the provisions of this chapter until the treasurer's or deputy treasurer's name, address, and electronic contact information is filed with the commission.

Thus, we have fully complied and filed all of the necessary reports and information you required. As requested previously, please confirm by reply email that:

(a) the PDC has officially closed its records on the WADE campaign committee as of the date of filing of these last C-4 reports on May 18, 2023; and

(b) our responses to your requests now finalize and resolve all outstanding issues associated with Complaint 82263 and Complaint 121957.

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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Myricks Law Group reported via email

4 months ago (Thu, 18 May 2023 at 2:06 PM)





To: "'PDC Support'" <pdc@pdc.wa.gov> Cc: officeadmin@pdc.wa.gov

(CORRECTION) | No Treasurer for Non-Existent Political Committee

As you know, WADE is not an existing political committee. Washington state law does not address the unique situation where committee financial reports are filed after a candidate or political committee no longer exists. As you will see below, RCW 42.17A.210 defines a "treasurer" only within the context of an <u>active</u> candidate or political committee:

Treasurer.

- (1) Each candidate, within two weeks after becoming a candidate, and each political committee, at the time it is required to file a statement of organization, shall designate and file with the commission the name and address of one legally competent individual, who may be the candidate, to serve as a treasurer.
- (2) A candidate, a political committee, or a treasurer may appoint as many deputy treasurers as is considered necessary and shall file the names and addresses of the deputy treasurers with the commission.
 - (3)(a) A candidate or political committee may at any time remove a treasurer or deputy treasurer.
- (b) In the event of the death, resignation, removal, or change of a treasurer or deputy treasurer, the candidate or political committee shall designate and file with the commission the name and address of any successor.
- (4) No treasurer or deputy treasurer may be deemed to be in compliance with the provisions of this chapter until the treasurer's or deputy treasurer's name, address, and electronic contact information is filed with the commission.

Thus, we have fully complied and filed all of the necessary reports and information you required. As requested previously, please confirm by reply email that:

(a) the PDC officially closed its records on the WADE committee on January 12, 2023, and

(b) our responses to your requests now finalize and resolve all outstanding issues associated with Complaint 82263 and Complaint 121957.

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

21 days ago (Wed, 16 Aug 2023 at 1:10 PM)



Counsel,

This is a follow up to the voicemail I left on both your desk and cell phones requesting that you call me back so we can discuss this case. As it stands, the current complaint against your client (WADE), has not been resolved.

Please call me at your earliest convenience so we can discuss this matter further.

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



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SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4

Washington Against Discrimination Everywhere (WADE) Washington Against Discrimination Everywhere -P O Box 604 Renton, WA 98057 Coverage: 01/01/2023 to 04/30/2023

Final report: No

Report number: 110147410

Reporting year: 2023

Date submitted: 05/18/2023

RECEIPTS

	\$0.00
\$0.00	
\$1,100.00	
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I certify this report is true and complete to the best of my knowledge

Treasurer's name and date

Abdirahman Mohamud, CPA - 05/18/2023

Schedule B: In-kind Contributions, Pledges, Orders, Debts and Obligations

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
03/27/2023	French Lynn 33530 1st Way South		Penalty fee from enforcement action on January 12, 2023	Fair market value: \$100.00
	, Federal Way, WA 98003-7332		(Complaint No. 82263)	Aggregate total (N): \$100.00
04/12/2023	Harrison Richelle 429 Kenyon Street, N.W., Washington, DC 20010	Retired	Legal fees for representation in enforcement hearing on January 12, 2023.	Fair market value: \$500.00 Aggregate total (N): \$500.00
04/16/2023	Connor Curtis 4952 Underwood Avenue , Baton Rouge, LA 70805		Legal fees for representation in enforcement hearing on January 12, 2023.	Fair market value: \$250.00 Aggregate total (N): \$250.00
04/17/2023	Waters George 4352 Floral Lane , Marianna, FL 32446		Legal fees for representation in enforcement hearing on January 12, 2023.	Fair market value: \$100.00 Aggregate total (N): \$100.00
04/17/2023	Waters Marian 4352 Floral Lane , Marianna, FL 32446		Legal fees for representation in enforcement hearing on January 12, 2023.	Fair market value: \$100.00 Aggregate total (N): \$100.00
04/18/2023	Yasu Tana 6033 California Avenue, SW , Seattle, WA 98136		Legal fees for representation in enforcement hearing on January 12, 2023.	Fair market value: \$50.00 Aggregate total (N): \$50.00

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

Report notes/attachments

Thic	ic	tho.	final	ranort	for	tho.	MVDE	campaign	committee.
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