



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

David Sawyer 2016 & 2018
Campaigns

Respondent.

PDC Case 29797

Report of Investigation

I. BACKGROUND

- 1.1 David Sawyer served as a State Representative from the 29th Legislative District for three two-year terms, having been elected in 2012, 2014, and 2016. He was also elected in 2018, but resigned after the election.

II. ALLEGATIONS IN COMPLAINT

- 2.1 On December 21, 2017, a complaint was filed with the Public Disclosure Commission (PDC) by Glen Morgan alleging that State Representative David Sawyer, his related candidate committee, its officers, and its treasurer have habitually and willfully committed frequent and multiple violations of RCW 42.17A. **(Exhibit 1)**
- 2.2 Mr. Morgan also filed the complaint as a Citizen Action Notice (CAN) under RCW 42.17A.765(4) on December 21, 2017, with the Attorney General's Office (AGO) and the Pierce County Prosecuting Attorney's Office. Mr. Morgan's complaint to the PDC alleged that David Sawyer and his related 2016 and 2018 campaigns for State Representative in the 29th Legislative District:
1. Failed to file accurate, timely C-3 and C-4 reports (RCW 42.17A.235). Mr. Morgan provided Exhibit A to the complaint to document the alleged violations.
 2. Failed to accurately and timely report debt. (RCW 42.17A.240(8)). Mr. Morgan provided Exhibit B to the complaint to document the alleged violations.

3. Failed to properly break down and describe expenses (RCW 42.17A.235; WAC 390-16-037; and WAC 390-16-205). Mr. Morgan provided Exhibit C to the complaint to document the alleged violations.
- 2.3 Mr. Morgan asked the PDC to investigate the possibility that David Sawyer and his related campaigns committed these allegations maliciously, and if that is the case, to refer the case to the Attorney General's office for criminal prosecution.
- 2.4 On January 16, 2018, PDC staff notified David Sawyer that on December 21, 2017, the PDC received a complaint filed by Glen Morgan, and that because the complaint was filed as a Citizen Action Notice under RCW 42.17A.765(4), the PDC would not be initiating a preliminary review of the complaint until the Attorney General's Office had taken action or indicated to the PDC that they would not be taking action.
- 2.5 On June 4, 2018, the Attorney General's Office notified Mr. Morgan that the AGO had completed its initial review of the allegations in his complaint, and determined that the matter should be left to the discretion of the Public Disclosure Commission.
- 2.6 On July 18, 2018, PDC staff notified Mr. Morgan of changes to the PDC's enforcement procedures, pursuant to Engrossed Substitute House Bill 2938, a law that took effect June 7, 2018.
- 2.7 On November 5, 2018, Mr. Morgan filed a "10-day letter" under the provisions of RCW 42.17A.775(2)(a) notifying the PDC that he intended to file a lawsuit against the respondent on behalf of the state as provided by law if a lawsuit was not filed by the state by November 15, 2018.
- 2.8 On November 14, 2018, PDC staff informed Mr. Morgan that after conducting a preliminary review and assessment of his complaint filed December 21, 2017, staff had opened a formal investigation on November 13, 2018, and held an Initial Hearing (Case Status Review on November 14, 2018, pursuant to RCW 42.17A.755 and WACs 390-37-060 and 390-37-071.

III. FINDINGS

- 3.1 On November 7, 2018, the PDC received a response to the complaint from David Sawyer. **(Exhibit 2)** Mr. Sawyer's response stated, "I believe I corrected any mistakes and the complaint is related to amended reports that corrected said mistakes. I trust Mr. Morgan correctly identified those amended filings."

Alleged failure to file accurate, timely C-3 and C-4 reports (RCW 42.17A.235). Mr. Morgan provided Exhibit A to the complaint to document the alleged violations.

- 3.2 PDC staff's review of the alleged failure to file accurate, timely C-3 and C-4 reports of contributions and expenditures found:

C-3 Reporting

3.3 The complaint alleged the 2016 Sawyer campaign filed 11 amended C-3 reports from 174 to 258 days late. The 11 amended C-3 reports were filed on January 10, January 22, and January 23, 2017 for previously filed reports. The underlying 11 original C-3 reports were filed timely, and the amended reports did not change the amounts included on the original reports. **(Exhibit 3)**

C-4 Reporting

3.4 The complaint alleged six original C-4 reports were filed late for the 2016 and 2018 campaigns. The first alleged late-filed C-4 report covered January 2016, was filed 32 days late on 3/13/16, and included no contributions received and \$484 in expenditures. **(Exhibit 4)**

3.5 The five remaining alleged late-filed C-4 reports covered: **(Exhibit 4)**

- February 2016, filed 3 days late;
- 21-day pre-primary period (2016), filed 1 day late;
- 21-day pre-general period (2016), filed 1 day late;
- Post-general election period (2016); filed 1 day late; and
- September 2017 (2018 election), filed 3 days late.

3.6 The complaint alleged 11 amended C-4 reports for 2016 were filed 3-196 days late. The reports covered the periods of April, May, 21 day pre-primary (three amendments), 7 day pre-primary (two amendments), post-primary, 21 day pre-general, 7 day pre-general, and December. **(Exhibit 5)**

3.7 The original April 2016 C-4 was filed timely on 5/5/16. It was amended 178 days after the due date. The contribution and expenditure amounts were unchanged.

3.8 The original May 2016 C-4 was filed timely on 6/10/16. It was amended 148 days after the due date. The contribution and expenditure amounts were unchanged.

3.9 The original 21 day pre-primary C-4 was filed one day late on 7/13/16. It was amended the first time three days after the due date for the original report. The contribution and expenditure amounts were unchanged, but the report added a memo describing an \$895 expenditure for the cost of a trip to a Democratic National Committee (DNC) meeting. The report was amended a second time 116 days after the due date for the original report, this time adding a \$21,000 expenditure for political consulting services and receipt of a \$300 in-kind contribution. The report was amended a third time 182 days after the due date for the original return with no changes to contributions or expenditures. The second amendment, adding a \$21,000 expenditure to Cerillion N4 Partners, appears to have been an expense that was missed and later corrected because there were two invoices for identical amounts from the same vendor. When reconciling the campaign's records, the mistake was discovered, and the amendment was filed.

- 3.10 The original 7 day pre-primary C-4 report was filed timely on 7/25/16. It was amended six days after the due date for the original report. The contribution and expenditure amounts were unchanged. A second amendment was filed 102 days after the due date for the original report. The contribution and expenditure amounts remained unchanged.
- 3.11 The original post-primary C-4 report was filed timely on 9/12/16. It was amended 54 days after the due date for the original report. The contribution and expenditure amounts were unchanged.
- 3.12 The original 21 day pre-general C-4 report was filed one day late on 10/19/16. The report was amended 18 days after the due date for the original report. The contribution and expenditure amounts were unchanged.
- 3.13 The original 7 day pre-general C-4 report was timely filed on 11/1/16. The report was amended four days after the due date for the original report. The contribution and expenditure amounts were unchanged.
- 3.14 The original December 2016 C-4 report was timely filed on 1/10/17. It was amended 196 days after the due date for the original report, reducing the amount transferred to Rep. Sawyer's Surplus Funds Account by \$1,590.

Alleged failure to accurately and timely report debt. (RCW 42.17A.240(8)). (The complaint included Exhibit B, a list of alleged debt not timely reported.)

- 3.15 On June 7, 2018, Engrossed Substitute House Bill (ESHB) 2938 became effective, clarifying that for the purposes of reporting expenditures under RCW 42.17A.240, debt does not include "regularly recurring expenditures of the same amount that have already been reported at least once and that are not late or outstanding."
- 3.16 Exhibit B to the complaint included 41 examples, totaling \$158,351.78, where the complainant alleged monetary expenditures should have been reported as "orders placed, debts, or obligations" on the report preceding the report showing the monetary expenditures, based on the complainant's assumption that the goods or services were likely purchased or ordered during the prior reporting period.
- 3.17 It appears the complainant assumed, for example, if a monetary expenditure was made on 11/23/16, after the general election, the goods or services were likely purchased, or at least ordered, during the 7 day pre-general election period of 10/18 – 10/31/2016, and that the 7 day pre-general C-4 report should have included "orders placed, debts, or obligations" for the estimated or known value of the goods or services ordered.
- 3.18 Staff reviewed Exhibit B to the complaint and found 12 instances, totaling \$112,090.19, where it appeared the reported monetary expenditures were likely purchased or ordered during the previous reporting period. **(Exhibit 6)**
- 3.19 These 12 expenditures were as follows:

1. Paid \$1,805.10 to Express Sign Co on 6/6/16 for Yard Signs.
2. Paid \$1,805.10 to Express Sign Co on 6/6/16 for Yard Signs.
3. Paid \$1,189.73 to Express Sign Co 8/1/16 for Yard Signs.
4. Paid \$1,189.73 to Express Sign Co on 8/3/16 for Signs.
5. Paid \$916.23 to Express Sign Co on 8/3/16 for Signs. Mr. Sawyer provided a copy of the invoice, dated 7/27/16. He was unable to determine when the order was placed, but acknowledged the purchase was likely ordered during the period preceding the period when payment was made.
6. Paid \$21,000 to Cerillion N4 Partners on 8/17/16 for Mailers.
7. Paid \$45,950 to Cerillion N4 Partners on 8/17/16 for TV Buy, Robo Calls, and Digital Advertising.
8. Paid \$5,000 to Cerillion N4 Partners on 8/17/16 for TV Buy, and Add-On.
9. Paid \$5,000 to Cerillion N4 Partners on 8/17/16 for Paid Phones.
10. Paid \$2,460 to Mark Ladenburg on 10/21/16 for Website Design.
11. Paid \$8,900 to Meyers Research on 10/27/16 for Polling.
12. Paid \$979.40 to Puyallup Tribe of Indians on 11/23/16 for Event/Food.
13. Paid \$17,700 to Cerillion on 11/23/16 for Consulting Services and Mailers.

3.20 Rep. Sawyer confirmed that the 12 expenditures identified by staff were likely ordered during the reporting period preceding the period the expenditures were reported as monetary expenditures, and likely should have been reported as orders placed, debts, or obligations on the prior report.

Alleged failure to properly break down and describe expenses (RCW 42.17A.235; WAC 390-16-037; and WAC 390-16-205). (The complaint included Exhibit C, a list of expenditures that allegedly failed to include a proper breakdown.)

3.21 Exhibit C to the complaint identified 22 examples where the complainant alleged the Sawyer campaign failed to properly break down or describe monetary expenditures, totaling \$104,069.65. The complaint alleged that expenditure descriptions failed to list the number of items purchased or printed, failed to list sub-vendors paid by the recipient of the expenditure payment, or failed to identify media outlets for broadcast political advertising. Staff reviewed Exhibit C to the complaint and found 17 instances, totaling \$101,660.25, where it appeared the expenditures required a more complete breakdown or description of the expenditures. **(Exhibit 7)**

3.22 Following are report details for the 17 vendors paid, including what was listed and what was missing from the description for the expenditures:

- For Express Sign Company, the description said, “Signs” or “Yard Signs” but did not list the number of signs purchased.
- For Cerillion, the description said: “Mailers,” “TV Buy, Robo Calls, Digital Advertising,” or “Paid Phones,” but did not include the number of mailers printed or the sub-vendors paid.
- For three reimbursements to Matthew Sawyer, the descriptions said, “Tools,” and “Fuel,” but did not list the underlying vendors where the items were purchased.
- For Seth Wright, the description said, “Signs,” but did not list the sub-vendor paid or number of signs purchased.
- For Mark Ladenburg, the description said, “Domain Fees,” but did not list the sub-vendors paid.
- For Sylvia Miller, the description said, “Frybread for Fundraiser,” but did not list the sub-vendor paid.
- For House Democratic Campaign Committee, the description said, “Polling,” but did not list the sub-vendor paid.
- For Bill Kiolbasa, the description said, “Fundraiser,” but did not list the sub-vendors paid.

3.23 Mr. Sawyer confirmed that the 17 expenditures identified by staff should have included a more complete expenditure description, including the number of items purchased or printed, and sub-vendors paid by the original vendor, including media outlets used for broadcasting political advertising.

IV. SCOPE

4.1 PDC staff reviewed the complaint and responses from David Sawyer. Staff reviewed reports filed by the respondent with the Public Disclosure Commission.

V. LAW

RCW 42.17A.235 and **.240** require candidates, single election issue political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Contributions are reported weekly

during this same time period, and must be disclosed on Monday for contributions deposited during the previous seven days.

WAC 390-16-037 obligates any person required to report the “purpose” of an expenditure under RCW 42.17A.240(6) or 42.17A.255(5)(b) to identify any candidate(s) or ballot proposition(s) supported or opposed by the expenditure, and to describe in detail the goods and/or services provided by the expenditure. The rule includes two examples for disclosing the details of the goods and/or services provided.

WAC 390-16-205 states expenditures by agents and agents’ sub-vendors, made on behalf of a candidate or political committee, shall be deemed expenditures by the candidate or committee. The rule states that in accordance with WAC 390-16-037, such expenditures shall be reported by the candidate or political committee as if made or incurred by the candidate or committee directly. The rule includes three examples for disclosing the details of the goods and/or services provided.

Respectfully submitted this 30th day of March 2020.

Electronically Signed Philip E. Stutzman

Philip E. Stutzman
Compliance Officer

EXHIBIT LIST

- Exhibit 1** Complaint and Exhibits
- Exhibit 2** Response to complaint
- Exhibit 3** Amended C-3 Analysis
- Exhibit 4** Original C-4 Analysis
- Exhibit 5** Amended C-4 Analysis
- Exhibit 6** Debt
- Exhibit 7** Expenditure Descriptions

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 21 Dec, 2017 at 10:06 PM) via Portal Meta
To Whom it May Concern --

It has come to my attention that David Sawyer, his related candidate committee, its officers, and its treasurer have habitually and willfully committed frequent and multiple violations of **RCW 42.17A**. Additionally, I have reason to believe that other violations of this chapter have occurred beyond what I have identified below.

1) Failure to file accurate, timely C3 and C4 reports. (Violation of RCW 42.17A.235)

State law requires that candidates and committees file frequent, accurate reports of contributions, expenditures, in-kind contributions, and debt. Unfortunately, David Sawyer has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

2) Failure to accurately, timely report debt. (Violation of RCW 42.17A.240 (8), see WAC 390-05-295)

State law requires that the name and address of any person and the amount owed for any debt, obligation, note, unpaid loan, or other liability in the amount of more than two hundred fifty dollars or in the amount of more than fifty dollars that has been outstanding for over thirty days be reported on form C4. Per **WAC 390-05-295**, this includes any oral or written order placed, debt or obligation to purchase goods or services or anything of value, or any offer to purchase advertising space, broadcast time or other advertising related product or service.

David Sawyer illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

State law requires that expenditures made on behalf of a candidate or political committee by any person, agency, firm, organization, etc. employed or retained for the purpose of organizing, directing, managing or assisting the candidate's or committee's efforts shall be deemed expenditures by the candidate or committee. In accordance with **WAC 390-16-037** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4. David Sawyer Committee illegally failed to break down the following expenses. (See **Exhibit C - "Illegal failure to break down expenditures"**)

The PDC should investigate the possibility that David Sawyer committed the above violations maliciously, which would be a class C felony per **RCW 42.17A.750 (2)(c)**. If the PDC determines that is the case, they should refer the case to the Attorney General's office for criminal prosecution immediately.

Please don't hesitate to contact me if you need any additional information.

Best Regards,

Glen Morgan

6 Attachments

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- **3439**

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100686482	C4	N		2/10/2016	3/13/2016	32
2	100686483	C4	N		3/10/2016	3/13/2016	3
3	100708219	C4	N		7/12/2016	7/13/2016	1
4	100708613	C4	Y		7/12/2016	7/15/2016	3
5	100713017	C4	Y		7/26/2016	8/1/2016	6
6	100728595	C4	N		10/18/2016	10/19/2016	1
7	100733999	C4	Y		7/12/2016	11/5/2016	116
8	100733996	C4	Y		10/18/2016	11/5/2016	18
9	100734000	C4	Y		6/10/2016	11/5/2016	148
10	100734001	C4	Y		5/11/2016	11/5/2016	178
11	100733998	C4	Y		7/26/2016	11/5/2016	102
12	100733997	C4	Y		9/12/2016	11/5/2016	54
13	100733995	C4	Y		11/1/2016	11/5/2016	4
14	100738445	C4	N		12/12/2016	12/13/2016	1
15	100741514	C4	Y		7/12/2016	1/10/2017	182
16	100778748	C4	Y		1/10/2017	7/25/2017	196
17	100792111	C4	N		10/10/2017	10/13/2017	3
18	100741506	C3	Y	7/6/2016	7/11/2016	1/10/2017	183
19	100741505	C3	Y	7/6/2016	7/11/2016	1/10/2017	183
20	100742257	C3	Y	7/26/2016	8/1/2016	1/22/2017	174
21	100742258	C3	Y	7/26/2016	8/1/2016	1/22/2017	174
22	100742265	C3	Y	5/13/2016	6/10/2016	1/22/2017	226
23	100742262	C3	Y	5/13/2016	6/10/2016	1/22/2017	226
24	100742259	C3	Y	5/26/2016	6/10/2016	1/22/2017	226

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		4674		As of -- 12/21/2017		
Viol atio n #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
1	THE SMOOT TEWES GROUP	9/28/2016	\$ 2,400.00	RESEARCH CONSULTING SERVICES	This should have been reported as debt on the post-primary C4.	465
2	SECRETARY OF STATE	5/17/2016	\$ 454.74	FILING FEES	This should have been reported as debt on the C4 covering the time period of April 2016.	589
3	MEYERS RESEARCH	10/27/2016	\$ 8,900.00	MEYERS RESEARCH,POLLING	This should have been reported as debt on the 21 day pre-general C4.	429
4	MARK LADENBURG	10/21/2016	\$ 2,460.00	WEBSITE DESIGN	This should have been reported as debt on the 21 day pre-general C4.	429
5	HARTMAN MCKENNA	10/4/2016	\$ 750.00	FUNDRAISER CONSULTING	This should have been reported as debt on the post-primary C4.	465
6	MEADOW CREATURE LLC	5/28/2016	\$ 328.20	YARD SIGN MATERIAL	This should have been reported as debt on the C4 covering the time period of April 2016.	589
7	FACEBOOK	5/28/2016	\$ 500.59	ADS	This should have been reported as debt on the C4 covering the time period of April 2016.	589
8	ANAHAUC MEXICAN RESTAURANT	5/13/2016	\$ 750.51	CAMPAIGN KICK OFF FOOD	This should have been reported as debt on the C4 covering the time period of April 2016.	589
9	CRYSTAL FINCHER CONSULTING	4/30/2016	\$ 1,260.00	CRYSTAL FINCHER CONSULTING	This should have been reported as debt on the C4 covering the time period of March 2016.	619
10	BRIAN DALBALCON	6/24/2016	\$ 500.00	PHOTOGRAPHY	This should have been reported as debt on the C4 covering the time period of May 2016.	559
11	ALASKA AIR	6/21/2016	\$ 895.20	TRAVEL TO DNC CONVENTION AS STANDING COMMITTEE MEMBER - SEE ATTACHED MEMO	This should have been reported as debt on the C4 covering the time period of May 2016.	559
12	WRIGHT ZETH	6/24/2016	\$ 420.00	FIELD ORGANIZING	This should have been reported as debt on the C4 covering the time period of May 2016.	559
13	XPRESS SIGN CO	8/1/2016	\$ 1,189.73	XPRESS SIGN CO,YARD SIGNS	This should have been reported as debt on the 7-day pre-primary C4.	513
14	CERILLION	8/17/2016	\$ 21,000.00	CERILLION,MAILERS	This should have been reported as debt on the 7-day pre-primary C4.	513
15	SUMMIT STRATEGIES	8/16/2016	\$ 1,000.00	SUMMIT STRATEGIES,WEBSITE DESIGN	This should have been reported as debt on the 7-day pre-primary C4.	513

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		4674		As of -- 12/21/2017		
Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
16	FACEBOOK	8/1/2016	\$ 250.57	ADVERTISEMENT	This should have been reported as debt on the 7-day pre-primary C4.	513
17	WRIGHT ZETH	8/16/2016	\$ 430.00	FIELD WORK	This should have been reported as debt on the 7-day pre-primary C4.	513
18	CERILLION	8/17/2016	\$ 45,950.00	CERILLION,TV BUY, ROBOCALLS, DIGITAL ADVERTISING	This should have been reported as debt on the 7-day pre-primary C4.	513
19	CERILLION	8/17/2016	\$ 5,000.00	CERILLION,TV BUY ADD-ON	This should have been reported as debt on the 7-day pre-primary C4.	513
20	CERILLION	8/17/2016	\$ 5,000.00	CERILLION,PAID PHONES	This should have been reported as debt on the 7-day pre-primary C4.	513
21	XPRESS SIGN CO	8/3/2016	\$ 1,189.73	SIGNS	This should have been reported as debt on the 7-day pre-primary C4.	513
22	XPRESS SIGN CO	8/3/2016	\$ 916.23	SIGNS	This should have been reported as debt on the 7-day pre-primary C4.	513
23	GRANQUIST MARCI	7/20/2016	\$ 447.50	TREASURY WORK	This should have been reported as debt on the 21 day pre-primary C4.	527
24	MARK LADENBURG	8/1/2016	\$ 980.00	MARK LADENBURG,WEBSITE AND EMAIL SERVICES	This should have been reported as debt on the 7-day pre-primary C4.	513
25	PUYALLUP TRIBE OF INDIANS	11/23/2016	\$ 979.40	PUYALLUP TRIBE OF INDIANS,EVENT/FOOD	This should have been reported as debt on the 7 day pre-general C4.	415
26	CERILLION	11/23/2016	\$ 17,700.00	CERILLION,CONSULTING SERVICES, MAILERS	This should have been reported as debt on the 7 day pre-general C4.	415
27	HOTEL MURANO	11/10/2016	\$ 290.31	HOTEL FOR ELECTION NIGHT PARTY	This should have been reported as debt on the 7 day pre-general C4.	415
28	GRANQUIST MARCI	6/8/2016	\$ 287.50	TREASURY WORK	This should have been reported as debt on the C4 covering the time period of May 2016.	559
29	XPRESS SIGN CO	6/6/2016	\$ 1,805.10	YARD SIGNS	This should have been reported as debt on the C4 covering the time period of May 2016.	559
30	CERILLION	7/11/2016	\$ 21,000.00	POLITICAL CONSULTING SERVICES	This should have been reported as debt on the C4 covering the time period of May 2016.	559
31	FACEBOOK	7/1/2016	\$ 750.03	ADVERTISEMENT	This should have been reported as debt on the C4 covering the time period of May 2016.	559

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		4674		As of -- 12/21/2017		
Violatio n #	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
32	GRANQUIST MARCI	12/27/2016	\$ 300.00	WIN BONUS	This should have been reported as debt on the C4 covering the time period of November 2016.	374
33	SAWYER DAVID	12/31/2016	\$ 7,709.39	DAVID SAWYER SURPLUS ACCOUNT	This should have been reported as debt on the C4 covering the time period of November 2016.	374
34	AT&T	12/16/2016	\$ 322.30	TELEPHONE	This should have been reported as debt on the C4 covering the time period of November 2016.	374
35	GRANQUIST MARCI	9/13/2017	\$ 375.00	TREASURY WORK	This should have been reported as debt on the C4 covering the time period of August 2017.	101
36	ATT	9/13/2017	\$ 364.30	PHONE BILL	This should have been reported as debt on the C4 covering the time period of August 2017.	101
37	HARTMAN MCKENNA	10/26/2017	\$ 900.00	CAMPAIGN CONSULTING SERVICE	This should have been reported as debt on the C4 covering the time period of September 2017.	72
38	BEST BUY	10/24/2017	\$ 1,326.64	CAMPAIGN LAPTOP	This should have been reported as debt on the C4 covering the time period of September 2017.	72
39	DELTA AIRLINES	11/1/2017	\$ 338.81	AIRFARE FOR EVENT	This should have been reported as debt on the C4 covering the time period of October 2017.	11
40	GRANQUIST MARCI	10/23/2017	\$ 550.00	TREASURY WORK	This should have been reported as debt on the C4 covering the time period of September 2017.	72
41	ERICKSON CLAIRE	10/2/2017	\$ 380.00	FUNDRAISING ASSISTANT	This should have been reported as debt on the C4 covering the time period of September 2017.	72
		Total	\$ 158,351.78			

Exhibit C -- Illegal Failure to breakdown expenditures.

Approximate Cumulative Days Late --		2212	As of --		12/21/2017		
Viola tion #	Vendor	Date	Amount	Description	Violation	Report #	Approx. days late as of today
1	XPRESS SIGN CO	10/3/2016	\$155.19	SIGNS	Failure to list number of items printed.	100733996	429
2	XPRESS SIGN CO	8/1/2016	\$1,189.73	XPRESS SIGN CO,YARD SIGNS	Failure to list number of items printed.	100733997	465
3	CERILLION	8/17/2016	\$21,000.00	CERILLION,MAILERS	Failure to list subvendor, number of items printed.	100733997	465
4	CERILLION	8/17/2016	\$45,950.00	CERILLION,TV BUY, ROBOCALLS, DIGITAL ADVERTISING	Failure to breakdown, identify subvendor, media outlets broadcast.	100733997	465
5	CERILLION	8/17/2016	\$5,000.00	CERILLION,TV BUY ADD-ON	Failure to breakdown, identify subvendor, media outlets broadcast.	100733997	465
6	CERILLION	8/17/2016	\$5,000.00	CERILLION,PAID PHONES	Failure to identify subvendor.	100733997	465
7	SAWYER MATTHEW	7/27/2016	\$65.54	TOOLS	Failure to identify subvendor.	100733997	465
8	SAWYER MATTHEW	7/28/2016	\$63.73	FUEL	Failure to identify subvendor.	100733997	465
9	SAWYER MATTHEW	8/1/2016	\$150.00	FIELD WORK	Failure to identify subvendor.	100733997	465
10	XPRESS SIGN CO	8/3/2016	\$1,189.73	SIGNS	Failure to list number of items printed.	100733997	465
11	XPRESS SIGN CO	8/3/2016	\$916.23	SIGNS	Failure to list number of items printed.	100733997	465
12	MARK LADENBURG	8/1/2016	\$980.00	MARK LADENBURG,WEBSITE AND EMAIL SERVICES	Failure to identify subvendor.	100733997	465
13	PUYALLUP TRIBE OF INDIANS	11/23/2016	\$979.40	PUYALLUP TRIBE OF INDIANS,EVENT/FOOD	Failure to identify subvendor.	100738445	374
14	CERILLION	11/23/2016	\$17,700.00	CERILLION,CONSULTING SERVICES, MAILERS	Failure to identify subvendor.	100738445	374
15	WRIGHT ZETH	11/21/2016	\$250.00	SIGNS	Failure to list subvendor, number of items printed.	100738445	374
16	XPRESS SIGN CO	6/6/2016	\$1,805.10	YARD SIGNS	Failure to list number of items printed.	100741514	527
17	FRED MEYER	6/15/2016	\$100.00	AD CARDS FOR FIELD ORGANIZER	Failure to list number of items printed.	100741514	527
18	MARK LADENBURG	12/31/2016	\$125.00	DOMAIN FEES	Failure to identify subvendor.	100778748	345
19	MARK LADENBURG	9/13/2017	\$200.00	WEBSITE	Failure to identify subvendor.	100792111	72
20	MILLER SYLVIA	10/6/2016	\$100.00	FRYBREAD FOR FUNDRAISER	Failure to identify subvendor.	100733996	429
21	HOUSE DEMOCRATIC CAMPAIGN COMMITTEE	8/1/2016	\$1,000.00	POLLING	Failure to identify subvendor.	100733997	465
22	KIOLBASA BILL	6/22/2016	\$150.00	FUNDRAISER	Failure to identify subvendor.	100741514	527
		Total	\$104,069.65				

Info (Wed, 7 Nov 2018 at 2:50 AM)

I believe I corrected any mistakes and the complaint is related to amended reports that corrected said mistakes. I trust Mr. Morgan correctly identified those amended filings.

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Amended C-3 Reports

Violation #	Report #	Amended Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Days Late	C-3 Contributions	Comments
19	100741505	100705974	C3	Y	7/6/2016	7/11/2016	1/10/2017	183	\$1,450	Original filed timely on 7/7/16; Same amount on amended C-3.
18	100741506	100705975	C3	Y	7/6/2016	7/11/2016	1/10/2017	183	\$25	Original filed timely on 7/7/16; Same amount on amended C-3.
20	100742257	100713014	C3	Y	7/26/2016	8/1/2016	1/22/2017	174	\$1,550	Original filed timely on 7/31/16; Same amount on amended C-3.
21	100742258	100712338	C3	Y	7/26/2016	8/1/2016	1/22/2017	174	\$7,750	Original filed timely on 7/28/16 with a total of \$8,750; Amended C-3 removed a \$1,000 contribution from WHCA PAC .
24	100742259	100742259	C3	Y	5/26/2016	6/10/2016	1/22/2017	226	\$850	Original filed timely on 5/26/16; Total amount unchanged.
23	100742262	100695392	C3	Y	5/13/2016	6/10/2016	1/22/2017	226	\$100	Original filed timely; amount unchanged; original is 100692392 even though amended C-3 says 100695397.
22	100742265	100742262	C3	Y	5/13/2016	6/10/2016	1/22/2017	226	\$100	Original filed timely on 5/13/16; \$100 amount unchanged; Contributor name amended from Brianna Dusseault to Luke Esser.

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Amended C-3 Reports

Violation #	Report #	Amended Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Days Late	C-3 Contributions	Comments
28	100742332	100695389	C3	Y	5/13/2016	6/10/2016	1/23/2017	227	\$4,135	Original filed timely on 5/13/16; \$4,135 total remain unchanged.
26	100742333	100742259	C3	Y	5/26/2016	6/10/2016	1/23/2017	227	\$850	Original filed timely on 5/26/16; Total amount unchanged.
25	100742334	100688165	C3	Y	3/31/2016	4/11/2016	1/23/2017	287	\$1,125	Original filed timely on 4/4/16; Amount unchanged.
27	100742337	100691760	C3	Y	4/25/2016	5/10/2016	1/23/2017	258	\$25	Original filed timely on 4/25/16; Amount unchanged.

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Original C-4 Reports

Vio #	Report #	From	To	Activity	Due Date	Day Reported	Days Late	Contributions	Expenditures	Comments
1	100686482	1/1/2016	1/31/2016	January	2/10/2016	3/13/2016	32		\$484	\$384 for expenses under \$50 each; Website maintenance \$100.
2	100686483	2/1/2016	2/29/2016	February	3/10/2016	3/13/2016	3			Only 3 dyas late
3	100708219	6/1/2016	7/11/2016	21 day pre-primary	7/12/2016	7/13/2016	1			Only 1 day late
6	100728595	9/1/2016	10/17/2016	21-day pre-general	10/18/2016	10/19/2016	1			Only 1 day late
14	100738445	11/1/2016	11/30/2016	Post-general	12/12/2016	12/13/2016	1			Only 1 day late
17	100792111	9/1/2017	9/30/2017	September	10/10/2017	10/13/2017	3			Only 3 dyas late

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Amended C-4 Reports

Vio #	Report #	From	To	Activity	Due Date	Day Reported	Days Late	Contributions	Expenditures	Comments
10	100734001	4/1/2016	4/30/2016	April	5/11/2016	11/5/2016	178	\$1,995	\$2,299	Original C-4 filed timely on 5/5/16; C-4 amended 178 days after due date with same amounts.
9	100734000	5/1/2016	5/31/2016	May	6/10/2016	11/5/2016	148	\$15,017	\$3,350	Original C-4 filed timely on 6/10/16; C-4 amended 148 days after due date with same amounts.
4	100708613 (1st Amendment)	6/1/2016	7/11/2016	21 day pre-primary	7/12/2016	7/15/2016	3	\$9,125	\$5,757	(21 pre-primary) Original filed 1 day late on 7/13/16; Contribution and expenditure amounts on amended C-4 remain unchanged; amendment added Memo about cost of DNC trip for \$895.
7	100733999 (2nd Amendment)	6/1/2016	7/11/2016	21 day pre-primary	7/12/2016	11/5/2016	116	\$9,425	\$27,057	(21 pre-primary) Original filed 1 day late on 7/13/16; 2nd amended C-4 filed 116 days late with \$21,000 expenditure added for "Political Consulting Services" and receipt of a \$300 in-kind contribution was added.
15	100741514 (3rd Amendment)	6/1/2016	7/11/2016	21 day pre-primary	7/12/2016	1/10/2017	182	\$9,425	\$27,057	(21 pre-primary) Original (100708613) filed 1 day late on 7/13/16; 100733999 amended original to add \$21,000 expenditure and \$300 In-kind contribution; 100741514 amended 100733999, but made no contribution or expenditure changes to the 2nd amendment. 100733999.

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Amended C-4 Reports

Vio #	Report #	From	To	Activity	Due Date	Day Reported	Days Late	Contributions	Expenditures	Comments
5	100713017 (1st Amendment)	7/12/2016	7/25/2016	7 day pre-primary	7/26/2016	8/1/2016	6	\$14,825	\$596	Original filed timely on 7/25/16; Amended report filed 6 days after due date, contribution & expenditure amounts unchanged.
11	100733998 (2nd Amendment)	7/12/2016	7/25/2016	7-day pre-primary	7/26/2016	11/5/2016	102	\$14,825	\$596	Original filed timely on 7/25/16; Amounts unchanged.
12	100733997	7/26/2016	8/31/2016	post-primary	9/12/2016	11/5/2016	54	\$73,031	\$85,155	Original C-4 filed timely on 9/12/16; Amended C-4 filed 54 days after due date, but with same amounts;
8	100733996	9/1/2016	10/17/2016	21 day pre-general	10/18/2016	11/5/2016	18	\$18,170	\$5,208	Original filed 1 day late on 10/19/16; Amounts unchanged.
13	100733995	10/18/2016	10/31/2016	7 day pre-general	11/1/2016	11/5/2016	4	\$7,600	\$13,019	Original filed timely on 11/1/16; Amounts unchanged.
16	100778748	12/1/2016	12/31/2016	December	1/10/2017	7/25/2017	196	\$2,200	\$9,281	Original December report filed timely on 1/10/17; C-4 amended 196 days after due date on 7/25/17, reducing amount transferred to SFA by \$1,590.

David Sawyer 2016 Campaign, PDC Case 29797
Staff Analysis of Debt Required to be Reported on an Earlier C-4 Report

Vio #	Vendor	Prior C-4 Reporting Period	Prior C-4 Reporting Period Description	Date Paid	Amount	Description	Alleged Violation
29	XPRESS SIGN CO	5/1-5/31	May	6/6/2016	\$ 1,805.10	YARD SIGNS	Allegedly should have been reported as debt on the C4 covering the time period of May 2016.
13	XPRESS SIGN CO	7/12-7/25	7 day pre-primary	8/1/2016	\$ 1,189.73	XPRESS SIGN CO,YARD SIGNS	Allegedly should have been reported as debt on the 7-day pre-primary C4.
21	XPRESS SIGN CO	7/12-7/25	7 day pre-primary	8/3/2016	\$ 1,189.73	SIGNS	Allegedly should have been reported as debt on the 7-day pre-primary C4.
22	XPRESS SIGN CO	7/12-7/25	7 day pre-primary	8/3/2016	\$ 916.23	SIGNS	Allegedly should have been reported as debt on the 7-day pre-primary C4.
14	CERILLION	7/12-7/25	7 day pre-primary	8/17/2016	\$ 21,000.00	CERILLION,MAILERS	Allegedly should have been reported as debt on the 7-day pre-primary C4.
18	CERILLION	7/12-7/25	7 day pre-primary	8/17/2016	\$ 45,950.00	CERILLION,TV BUY, ROBOCALLS, DIGITAL ADVERTISING	Allegedly should have been reported as debt on the 7-day pre-primary C4.
19	CERILLION	7/12-7/25	7 day pre-primary	8/17/2016	\$ 5,000.00	CERILLION,TV BUY ADD-ON	Allegedly should have been reported as debt on the 7-day pre-primary C4.
20	CERILLION	7/12-7/25	7 day pre-primary	8/17/2016	\$ 5,000.00	CERILLION,PAID PHONES	Allegedly should have been reported as debt on the 7-day pre-primary C4.
4	MARK LADENBURG	9/1-10/17	21 day ore-general	10/21/2016	\$ 2,460.00	WEBSITE DESIGN	Allegedly should have been reported as debt on the 21 day pre-general C4.
3	MEYERS RESEARCH	9/1-10/17	21 day ore-general	10/27/2016	\$ 8,900.00	MEYERS RESEARCH,POLLING	Allegedly should have been reported as debt on the 21 day pre-general C4.
25	PUYALLUP TRIBE OF INDIANS	10/18-10/31	7 day pre-general	11/23/2016	\$ 979.40	PUYALLUP TRIBE OF INDIANS,EVENT/FOOD	Allegedly should have been reported as debt on the 21 day pre-general C4.
26	CERILLION	10/18-10/31	7 day pre-general	11/23/2016	\$ 17,700.00	CERILLION,CONSULTING SERVICES, MAILERS	Allegedly should have been reported as debt on the 7 day pre-general C4.
				Total	\$ 112,090.19		

David Sawyer, PDC Case 29797
Alleged Failure to Timely Breakdown or Describe Expenditures

Viola	Vendor	Date	Amount	Description	Violation	Report #
1	XPRESS SIGN CO	10/3/2016	\$155.19	SIGNS	Failure to list number of items printed.	100733996
2	XPRESS SIGN CO	8/1/2016	\$1,189.73	XPRESS SIGN CO,YARD SIGNS	Failure to list number of items printed.	100733997
3	CERILLION	8/17/2016	\$21,000.00	CERILLION,MAILERS	Failure to list subvendor, number of items printed.	100733997
4	CERILLION	8/17/2016	\$45,950.00	CERILLION,TV BUY, ROBOCALLS, DIGITAL ADVERTISING	Failure to breakdown, identify subvendor, media outlets broadcast.	100733997
5	CERILLION	8/17/2016	\$5,000.00	CERILLION,TV BUY ADD-ON	Failure to breakdown, identify subvendor, media outlets broadcast.	100733997
6	CERILLION	8/17/2016	\$5,000.00	CERILLION,PAID PHONES	Failure to identify subvendor.	100733997
7	SAWYER MATTHEW	7/27/2016	\$65.54	TOOLS	Failure to identify subvendor.	100733997
8	SAWYER MATTHEW	7/28/2016	\$63.73	FUEL	Failure to identify subvendor.	100733997
10	XPRESS SIGN CO	8/3/2016	\$1,189.73	SIGNS	Failure to list number of items printed.	100733997
11	XPRESS SIGN CO	8/3/2016	\$916.23	SIGNS	Failure to list number of items printed.	100733997
14	CERILLION	11/23/2016	\$17,700.00	CERILLION,CONSULTING SERVICES, MAILERS	Failure to identify subvendor.	100738445
15	WRIGHT ZETH	11/21/2016	\$250.00	SIGNS	Failure to list subvendor, number of items printed.	100738445
16	XPRESS SIGN CO	6/6/2016	\$1,805.10	YARD SIGNS	Failure to list number of items printed.	100741514
18	MARK LADENBURG	12/31/2016	\$125.00	DOMAIN FEES	Failure to identify subvendor.	100778748
20	MILLER SYLVIA	10/6/2016	\$100.00	FRYBREAD FOR FUNDRAISER	Failure to identify subvendor.	100733996
21	HOUSE DEMOCRATIC CAMPAIG	8/1/2016	\$1,000.00	POLLING	Failure to identify subvendor.	100733997
22	KIOLBASA BILL	6/22/2016	\$150.00	FUNDRAISER	Failure to identify subvendor.	100741514
		Total	\$101,660.25			