

Respondent Name
Washingtonians To Recall Inslee
Complainant Name
Kevin j.OSullivan
Complaint Description
<p><u><a href="#">Osullivan k</a></u>  reported via the portal  (Mon, 26 Jun 2023 at 6:51 PM)</p> <p>Hello:</p> <p>It has come to my attention that C Davis' 2023 committee "Washingtonians to Recall Inslee" has committed a number of violations of state law.</p> <p>1) Late C4 Reports (RCW 42.17A.235 &amp; .240)</p> <p>The report covering May of 2022 was filed 7 days late: <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110093441">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110093441</a></p> <p>The report covering August of 2022 was filed 7 days late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941</a></p> <p>The report covering September of 2022 was 4 days late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110118877">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110118877</a></p> <p>The report covering October of 2022 was 15 days late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127135">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127135</a></p> <p>The report covering November of 2022 was 5 days late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130208">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130208</a></p> <p>The report covering March of 2022 was 14 days late:  <a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110143690">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110143690</a></p> <p>Additionally, nearly all of the C4's filed by C Davis erroneously state that they are the "Last" report, even though he reports a balance of precisely \$2,216.78 remaining in the bank account as of the last C4 filed. I believe this number is likely inaccurate.</p> <p>2) Failure to properly break down expenditures:  The following expenditures don't contain the level of detail required:</p> <p>ULINE 03/22/2021      Envelopes      Chicago IL      \$87.50 (Doesn't include quantity)</p>

FU GLOBAL	04/30/2021	Poly bags	Seattle WA	\$74.36 (Doesn't include quantity)
<p>Please keep in mind that C Davis has previously been reprimanded by the PDC on 3 occasions.</p> <p>Reprimand #1: <a href="https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/5263/107983%20Washingtonians%20to%20Recall%20Inslee%20Complaint%20Return%20Letter...pdf">https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/5263/107983%20Washingtonians%20to%20Recall%20Inslee%20Complaint%20Return%20Letter...pdf</a></p> <p>Reprimand #2: <a href="https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/4899/95815%20Washingtonians%20to%20Recall%20Inslee%20Complaint%20Return%20Letter.pdf">https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/4899/95815%20Washingtonians%20to%20Recall%20Inslee%20Complaint%20Return%20Letter.pdf</a></p> <p>Reprimand #3: <a href="https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/4974/98702%20Davis%20C.%20Complaint%20Return%20Letter....pdf">https://pdc-case-tracking.s3.us-gov-west-1.amazonaws.com/4974/98702%20Davis%20C.%20Complaint%20Return%20Letter....pdf</a></p>				
<b>What impact does the alleged violation(s) have on the public?</b>				
<p>The report covering May of 2022 was filed 7 days late:</p> <p>The report covering August of 2022 was filed 7 days late:</p> <p>The report covering September of 2022 was 4 days late</p> <p>The report covering October of 2022 was 15 days late:</p> <p>The report covering November of 2022 was 5 days late:</p> <p>The report covering March of 2022 was 14 days late:</p>				
<b>List of attached evidence or contact information where evidence may be found</b>				
<p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941</a></p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110118877">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110118877</a></p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110113941</a></p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127135">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110127135</a></p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130208">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110130208</a></p> <p><a href="https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110143690">https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110143690</a></p>				
<b>List of potential witnesses with contact information to reach them</b>				
<p>Additionally, nearly all of the C4's filed by C Davis erroneously state that they are the "Last" report, even though he reports a balance of precisely \$2,216.78 remaining in the bank account as of the last C4 filed. I believe this number is likely inaccurate.</p>				
<b>Certification (Complainant)</b>				
<p>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.</p>				