

Respondent Name
Island County Democrats PAC
Complainant Name
Glen Morgan
Complaint Description
<p>Glen Morgan reported via the portal (Tue, 15 Oct 2024 at 5:45 PM)</p> <p>To whom it may concern,</p> <p>It has come to my attention that the Island County Democrats PAC, has, once again, violated Washington State’s campaign finance laws (RCW 42.17A). The details are as follows:</p> <p>1) Attempt to conceal true sub vendors and legally required details from the public on expenditures (Violation of RCW 42.17A.235, RCW 42.17A.240, WAC 390-16-037)</p> <p>This secretive, shady, dark money PAC has once again violated Washington State’s campaign finance laws despite the simplicity, clarity, and very obvious requirements explained in WAC 390-16-037, example B, when they reported an in-kind expenditure from the Washington State Democrats for “Campaign Signs printed by Capital City Press” valued at \$624.884 on 10/8/2024. Despite the ease of complying with Washington State’s campaign finance laws, this crew decided to clearly threaten Democracy by failing to provide the legally required details as so obviously explained in WAC 390-16-037, example B, and worse than this - they also decided to conceal from the public which candidate (or candidates) these signs are supporting. Again, the law is so clear on this matter, yet they decided to break the law anyway. (See PDC C4 expenditure Report # 110251772, attached for staff reference).</p> <p>While this clear threat against Democracy, Freedom, and the very future of our state must be addressed, this violation also needs to be put in the context of this organization’s previous shameful history of lawbreaking.</p> <p>Island County Democrats - A Sad, Shameful history and culture of breaking the law – a decade of endless lawbreaking</p> <p>The Island County Democrats are clearly addicted to breaking the law – particularly any law that involves compliance with Washington State’s campaign finance laws. It should be noted this crew is currently under an active investigation by the PDC (See PDC Enforcement Case #142293), and that investigation is over a year old, and they are still breaking the law right now. I first caught their egregious lawbreaking back in 2017 (See PDC Enforcement Case #21332 – complaint and response attached for staff reference). I had documented years of late reports, and this crew readily admitted my complaint was accurate and had merit. Rather than actually correct their lawbreaking, this committee at the time took the same action as a handful of other shady, illegal PACs at the time, and they attempted to illegally “dissolve” and then fraudulently convey their cash in an effort to avoid complying with Washington State Law (See PDC Enforcement Case #28283). This led to a Citizen Action Notice case filed by me on behalf of the state of Washington (since neither the PDC nor the AG wanted to enforce the law in this case) against this illegal crew of lawbreaking folk (See copy of attached complaint – Thurston County Superior Court #17-2-04836-34)</p> <p>The fraudulent conveyance effort was made by these guys when they tried to dump their cash on their attorneys and the Washington State Democratic Party (See “final” C4 filed in late 2017 – PDC C4 Report # 100798573, attached for the record). At the same time, they pretended they no longer existed (see letter dated November 3, 2017 from the attorney for the Island County Democrats). However, Thurston County Superior Court Judge Lanese ruled against this tactic by the Island County Democrats on February 6, 2018, and this was consistent with a similar letter sent by PDC Executive Director Peter Lavallo to other PACs at that time who were attempting this tactic (see attached). After this, the law firm quickly dumped the Island County Democrats as a client (see letter attached).</p> <p>It is clear from past behavior, this organization will commit any crime, lie about everything and continue to do this moving forward if they believe they can get away with it. No wonder Clyde Shavers felt so comfortable moving into this area and coordinating with them. So far, the PDC has been willing to let them break the law for many years. It is not clear if anyone in this organization has any interest in ever following the law in the future.</p>

However, even if lawbreaking is an addiction with the Island County Democrats, I still believe in possible redemption for anyone. Even addictions to lawbreaking can be broken. There is an opportunity to turn over a new leaf, if they desire to do so as unlikely as that desire might be.

With this history of lawbreaking, it appears that PDC Warning Letters are not enough to convince these guys to follow the law, and it seems appropriate that compliance be obtained through a PDC fine at least, if we are to save Democracy, of course.

Let me know if you need any more on this one.

Best Regards,

Glen Morgan

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

The public has a right to know the truth, the legally required information, that shady secretive dark money PACs like this one try to conceal from the public right before an election. This is particularly true when it comes to an organization with such a troubled history of over 10 years wildly breaking the law.

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

See exhibits attached and referenced in the complaint

List of potential witnesses with contact information to reach them

Every officer involved in this PAC, unless they've left the country to a country that won't extradite them back.

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.



711 Capitol Way Suite 206
PO Box 40908 Olympia, WA 98504-0908
(360) 753-1111
Toll Free 1-800-601-2828

**SUMMARY, FULL REPORT RECEIPTS
AND EXPENDITURES**

C4

Island County Democratic Political Action Committee (ICDPAC)
Island County Democratic Political Action Committee -
P. O. Box 775
Oak Harbor, Washington 98277

Coverage: 09/01/2024 to 10/14/2024
Final report: No
Report number: 110251772
Reporting year: 2024
Date submitted: 10/14/2024

RECEIPTS

1. Previous total cash and in-kind contributions (last C4 line 8).		\$11,752.45
2. Cash received (Schedule A line 1).	\$455.00	
3. In-kind contributions received (Line 1 schedule B).	\$624.84	
4. Total cash and in-kind contributions received this period (Lines 2 + 3).		\$1,079.84
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).		\$12,832.29
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).		\$4,155.43
11. Cash expenditures (Line 3 schedule A).	\$4,181.00	
12. In-kind expenditures (Line 1 schedule B).	\$624.84	
13. Total cash and in-kind expenditures made this period (Lines 11 + 12).		\$4,805.84
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).		\$8,961.27

CASH SUMMARY

18. Cash on hand (Lines 8 - 17)		\$3,871.02
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)		\$3,871.02

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

Treasurer's name and date

Margaret Andersen - 10/14/2024

Schedule A: Cash Receipts and Expenditure Detail

1. CONTRIBUTIONS AND OTHER CASH RECEIPTS REPORTED ON THE C3:

Deposit date	Amount	Deposit date	Amount	Deposit date	Amount
09/10/2024	\$250.00	09/18/2024	\$25.00	10/01/2024	\$25.00
09/11/2024	\$25.00	09/20/2024	\$25.00	10/09/2024	\$50.00
09/12/2024	\$10.00	09/30/2024	\$20.00	10/11/2024	\$25.00

2. TOTAL CASH RECEIPTS (LINE 2 OF C4): \$455.00

3. EXPENDITURES (CASH AND CREDIT TRANSACTION DETAIL):

Date paid	Vendor or recipient (Name and address)	Purpose of expense and/or description	Credit/Debt	Cash
N/A	Expenses	Non-itemized expenditures		\$281.00
09/20/2024	Elect Christina Elliott Campaign Committee PO Box 2496 , Oak Harbro, WA 98277	Monetary contributions to PAC or candidate: candidate campaign contribution		\$1,200.00
09/21/2024	FRIENDS OF DAVE PAUL P. O. BOX 387 , OAK HARBOR, WA 98277	Monetary contributions to PAC or candidate: candidate campaign contribution		\$500.00
09/21/2024	Friends of Marie Shimada PO Box 577 , Freeland, WA 98249	Monetary contributions to PAC or candidate: candidate campaign contribution		\$600.00
09/21/2024	Elect Clyde Shavers PO Box 387 , Oak Harbor, WA 98277	Monetary contributions to PAC or candidate: candidate campaign contribution		\$500.00
09/21/2024	Friends of Janet St Clair 370 N. East Camano Dr, #11 , Camano Island, WA 98282	Monetary contributions to PAC or candidate: candidate campaign contribution		\$500.00
09/21/2024	Elect Melanie Bacon PO Box 662 , Langley, WA 98260	Monetary contributions to PAC or candidate: candidate campaign contribution		\$600.00
			\$0.00	\$4,181.00

4. TOTAL EXPENDITURES: \$4,181.00

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

1. IN-KIND CONTRIBUTIONS RECEIVED:

Date Received	Contributor	Employer/Occupation	Description	Amount
10/08/2024	WASHINGTON STATE DEMOCRATS 1932 1st Ave, Ste 400 , SEATTLE, WA 98101		campaign signs printed by Capitol City Press, 2975 37th Ave SW, Tumwater WA 98512	Fair market value: \$624.84 Aggregate total (N): \$2,624.84

2. PLEDGES RECEIVED BUT NOT YET PAID:

No pledges reported this period

3. ORDERS PLACED, DEBTS AND OBLIGATIONS:

No debt reported this period

Island County Democratic PAC - Illegal concealment of the truth from the public - delayed and concealed information

Report #	Type	Amends	Deposit Date	From	Through	Projected Due Date	Date Submitted	Projected Days Late	Est. Total Activity	Filer	Hyperlink
110156453	C3	110112196	9/9/2022			9/12/2022	7/5/2023	296	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110156453
110107182	C4	0		1/1/2022	1/31/2022	2/10/2022	8/15/2022	186	\$8.92	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107182
110107184	C4	0		2/1/2022	2/28/2022	3/10/2022	8/15/2022	158	\$10.01	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107184
110147324	C3	0	12/16/2022			1/10/2023	5/17/2023	127	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147324
110107185	C4	0		3/1/2022	3/31/2022	4/11/2022	8/15/2022	126	\$832.34	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107185
110149676	C4	110147374		1/1/2023	1/31/2023	2/10/2023	6/5/2023	115	\$20.74	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110149676
110149700	C3	0	1/6/2023			2/10/2023	6/5/2023	115	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110149700
110107187	C4	0		4/1/2022	4/30/2022	5/10/2022	8/15/2022	97	\$458.38	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107187
110147374	C4	0		1/1/2023	1/31/2023	2/10/2023	5/17/2023	96	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147374
110147334	C3	0	1/19/2023			2/10/2023	5/17/2023	96	\$35.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147334
110147333	C3	0	1/12/2023			2/10/2023	5/17/2023	96	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147333
110147332	C3	0	1/11/2023			2/10/2023	5/17/2023	96	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147332
110149689	C4	110147375		2/1/2023	2/28/2023	3/10/2023	6/5/2023	87	\$25.75	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110149689
110147375	C4	0		2/1/2023	2/28/2023	3/10/2023	5/17/2023	68	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147375
110147347	C3	0	2/22/2023			3/10/2023	5/17/2023	68	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147347
110147346	C3	0	2/16/2023			3/10/2023	5/17/2023	68	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147346
110147345	C3	0	2/14/2023			3/10/2023	5/17/2023	68	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147345
110147343	C3	0	2/13/2023			3/10/2023	5/17/2023	68	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147343
110147341	C3	0	2/8/2023			3/10/2023	5/17/2023	68	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147341
110147337	C3	0	2/2/2023			3/10/2023	5/17/2023	68	\$100.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147337
110107189	C4	0		5/1/2022	5/31/2022	6/10/2022	8/15/2022	66	\$8.41	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107189
110139502	C4	0		12/1/2022	12/31/2022	1/10/2023	3/16/2023	65	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110139502
110149687	C4	110147376		3/1/2023	3/31/2023	4/10/2023	6/5/2023	56	\$417.77	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110149687

110024142 C3	0	3/9/2021		4/12/2021	6/7/2021	56	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4943554
110024138 C3	0	3/25/2021		4/12/2021	6/7/2021	56	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4943549
110001877 C4	110000301	9/1/2020	10/12/2020	10/13/2020	12/8/2020	56	\$10,653.28	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4920404
110001887 C4	110000302	10/13/2020	10/26/2020	10/27/2020	12/8/2020	42	\$6,000.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4920415
110147376 C4	0	3/1/2023	3/31/2023	4/10/2023	5/17/2023	37	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147376
110147353 C3	0	3/30/2023		4/10/2023	5/17/2023	37	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147353
110147352 C3	0	3/21/2023		4/10/2023	5/17/2023	37	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147352
110147351 C3	0	3/16/2023		4/10/2023	5/17/2023	37	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147351
110147350 C3	0	3/14/2023		4/10/2023	5/17/2023	37	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147350
110147349 C3	0	3/13/2023		4/10/2023	5/17/2023	37	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147349
110147348 C3	0	3/8/2023		4/10/2023	5/17/2023	37	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147348
110000301 C4	110000250	9/1/2020	10/12/2020	10/13/2020	11/19/2020	37	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918797
110000247 C3	110000246	10/9/2020		10/12/2020	11/18/2020	37	\$75.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918742
110000246 C3	101005073	10/9/2020		10/12/2020	11/18/2020	37	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918743
110000250 C4	101006134	9/1/2020	10/12/2020	10/13/2020	11/18/2020	36	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918746
110107192 C4	0	7/1/2022	7/31/2022	7/12/2022	8/15/2022	34	\$1,964.91	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107192
110107190 C4	0	6/1/2022	6/30/2022	7/12/2022	8/15/2022	34	\$753.82	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110107190
101005123 C4	100997679	7/28/2020	8/31/2020	9/10/2020	10/12/2020	32	\$20.42	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4908254
100995727 C3	0	7/29/2020		8/3/2020	9/4/2020	32	\$30.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4898769
100995726 C3	0	7/29/2020		8/3/2020	9/4/2020	32	\$200.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4898768
110032890 C3	0	6/7/2021		6/14/2021	7/13/2021	29	\$14.12	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4952369
110149681 C4	110147377	4/1/2023	4/30/2023	5/10/2023	6/5/2023	26	\$429.65	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110149681
110000302 C4	110000251	10/13/2020	10/26/2020	10/27/2020	11/19/2020	23	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918798
110000248 C3	0	10/25/2020		10/26/2020	11/18/2020	23	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918744
110000251 C4	101012047	10/13/2020	10/26/2020	10/27/2020	11/18/2020	22	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4918747

110125396 C4	0	10/1/2022	10/31/2022	10/18/2022	11/7/2022	20	\$400.85	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110125396
101001757 C3	0	9/8/2020		9/14/2020	9/28/2020	14	\$6,000.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4904847
100993475 C3	0	8/9/2020		8/10/2020	8/24/2020	14	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4896509
100993469 C3	0	8/4/2020		8/10/2020	8/24/2020	14	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4896503
110147377 C4	0	4/1/2023	4/30/2023	5/10/2023	5/17/2023	7	\$0.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147377
110147366 C3	0	4/17/2023		5/10/2023	5/17/2023	7	\$606.51	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147366
110147364 C3	0	4/28/2023		5/10/2023	5/17/2023	7	\$50.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147364
110147363 C3	0	4/19/2023		5/10/2023	5/17/2023	7	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147363
110147362 C3	0	4/18/2023		5/10/2023	5/17/2023	7	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147362
110147361 C3	0	4/12/2023		5/10/2023	5/17/2023	7	\$35.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147361
110147360 C3	0	4/6/2023		5/10/2023	5/17/2023	7	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110147360
110121732 C3	0	10/15/2022		10/17/2022	10/24/2022	7	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://apollo.pdc.wa.gov/public/registrations/campaign-finance-report/110121732
100993479 C3	0	8/13/2020		8/17/2020	8/24/2020	7	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4896513
100995712 C3	0	8/26/2020		8/31/2020	9/4/2020	4	\$50.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4898754
100995711 C3	0	8/25/2020		8/31/2020	9/4/2020	4	\$25.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4898753
101004188 C3	0	10/4/2020		10/5/2020	10/8/2020	3	\$5,000.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4907316
100997657 C3	0	9/4/2020		9/7/2020	9/10/2020	3	\$10.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4900696
100925662 C3	0	8/15/2019		8/19/2019	8/21/2019	2	\$120.20	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4826828
101014172 C3	0	10/28/2020		11/2/2020	11/3/2020	1	\$20.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4917591
101012043 C3	0	10/23/2020		10/26/2020	10/27/2020	1	\$70.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915365
101012039 C3	0	10/21/2020		10/26/2020	10/27/2020	1	\$410.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915361
101012021 C3	0	10/23/2020		10/26/2020	10/27/2020	1	\$116.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915343
101012017 C3	0	10/22/2020		10/26/2020	10/27/2020	1	\$525.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915339
101012002 C3	0	10/21/2020		10/26/2020	10/27/2020	1	\$20.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915325
101011999 C3	0	10/22/2020		10/26/2020	10/27/2020	1	\$40.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915322

101011994 C3	0	10/21/2020	10/26/2020	10/27/2020	1	\$30.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915317
101011988 C3	0	10/21/2020	10/26/2020	10/27/2020	1	\$300.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915311
101011984 C3	0	10/21/2020	10/26/2020	10/27/2020	1	\$100.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915307
101011976 C3	0	10/21/2020	10/26/2020	10/27/2020	1	\$60.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4915299
100927653 C3	0	8/28/2019	9/2/2019	9/3/2019	1	\$200.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4828917
100927652 C3	0	8/26/2019	9/2/2019	9/3/2019	1	\$708.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4828916
100927631 C3	0	8/26/2019	9/2/2019	9/3/2019	1	\$656.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4828895
100927623 C3	0	8/26/2019	9/2/2019	9/3/2019	1	\$2,235.00	Island County Democratic Political Action Committee (ICDPAC)	https://web.pdc.wa.gov/rptimg/default.aspx?docid=4828887

SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4
(3/97)

PDC OFFICE USE
100798573
11-03-2017

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

Island County Democratic Central Committee

Mailing Address

PO Box 775

City

Oak Harbor, WA

Zip + 4

98277

Office Sought (Candidates)

Election Date

2017

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

Report Period Covered

From (last C-4)

10/31/17

To (end of period)

11/30/17

Final Report?

Yes X No

RECEIPTS

*See next page

Yes

No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet)	\$	19,901.11
2. Cash received (From line 2, Schedule A)	\$	250.00
3. In kind contributions received (From line 1, Schedule B)		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3)		250.00
5. Loan principal repayments made (From line 2, Schedule L)		0.00
6. Corrections (From line 1 or 3, Schedule C)	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6)	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7)		20,151.11
9. Total pledge payments due (From line 2, Schedule B)		0.00

EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet)		9,436.86
11. Total cash expenditures (From line 4, Schedule A)		10,714.25
12. In kind expenditures (goods & services) (From line 1, Schedule B)		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)		10,714.25
14. Loan principal repayments made (From line 2, Schedule L)		0.00
15. Corrections (From line 2 or 3, Schedule C)	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15)	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)		20,151.11

CANDIDATES ONLY

Name not

Won

Lost

Unopposed

on ballot

Primary election

☐☐☐☐

General election

☐☐☐☐

Treasurer's Daytime Telephone No.:

(360) 682-2662

CASH SUMMARY

18. Cash on hand (Line 8 minus line 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 (Surplus or deficit) (Line 18 minus line 19)	0.00

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

Candidate's Signature

Date

Treasurer's Signature

Date

Merri T Huffine

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

A
(11/93)

2

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

Report Date

10/31/17

11/30/17

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

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10/31/2017	250.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 250.00

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

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

CODE
DEFINITIONS
ON NEXT PAGE

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

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

3. EXPENDITURES

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

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
11/03/17	SCHWERIN CAMPBELL ET AL, 18 W. Mercer Street, Suite 400 Seattle, WA 98119		SCHWERIN CAMPBELL ET AL, ATTORNEYS AT LAW, Retainer	451.00
11/03/17	WASHINGTON STATE DEMOCRATIC 615 2nd Ave., Suite 580 Seattle, WA 98104		Donation to non-exempt fund.	5,000.00
11/03/17	SCHWERIN CAMPBELL ET AL, 18 W. Mercer Street, Suite 400 Seattle, WA 98119		Retainer.	5,184.39
11/03/17	MATH CORRECTION PO Box 775 Oak Harbor, WA 98277		math correction of historical data	78.86

Total from attached pages \$ 0.00

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 10,714.25

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Sun, 10 Dec at 10:54 PM) via Portal Meta
To Whom it May Concern --

It has come to my attention that the Island County Democratic Central Committee, as well as current & past officers Scott Chaplin, Janet St. Clair, Jerry Hill, Merri Huffine, Angie Homola, Steve DeHaven, Arthur Huffine, Brea Wetzel, Melody Risner, Gary McIntyre, Carolyn Tamler, and Sue Tingstad 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.

*By way of this complaint, I am alleging that the committee officers listed above also violated RCW 42.17A in the ways outlined in **PDC Complaint #21332**.*

1) Illegal dissolution of political committee. (Violation of RCW 42.17A.235(8))

State law prohibits political committees from dissolving until they have discharged all debts & obligations and ceased all activity & functions.

The Island County Democratic Central Committee was unable to dissolve as it was legally obligated to file a response in a court case where they were a named respondent. As such, their dissolution is illegal and invalid.

Despite this requirement in state law, the officers of the Island County Democratic Central Committee chose to dissolve their committee on November 3, 2017 after being sued by the State of Washington for habitual, frequent, and serious violations of **RCW 42.17A**. *See **Thurston Co. Case No. 17-2-04836-36***.

The charges levied against the committee were serious, and – by the committee’s own admission in its response to the PDC– it was largely guilty of the violations initially identified in the initial complaint.

Yet, rather than face the consequences of their actions and pay a penalty for violating state law as other committees have done, **the Island County Democratic Central Committee opted to engage in a fraudulent conveyance scheme**. On the same day they dissolved their committee, they transferred the \$10,635 of remaining committee funds to their law firm (\$5635.39) and to the Washington State Democratic Central Committee (\$5000).

Pursuant to **Superior Court Civil Rule 12**, all defendants must provide an answer within 20 days of service. They were provided service of the amended complaint on 10/16/2017 and were required to submit an answer by 11/5/2017, but dissolved two days prior to that deadline.

The required answer and all other legal work on the case would constitute reportable activity (either as an expenditure/in-kind contribution/debt) that would have to be filed on form C4. As such, it is simply not possible for a political committee to dissolve itself during pending litigation.

Moreover, under **the absurdity doctrine**, U.S. courts have always interpreted statutes contrary to their plain meaning to avoid absurd results. If the PDC or the judicial system were to hold that committees could dissolve themselves mid litigation to escape liability, the result would be that political committees would simply dissolve in response to any substantive complaint. There would be no purpose in having any campaign finance laws as there would be no meaningful way to hold political committees accountable for their violations.

Please note that per **RCW 42.17A.904**, the provisions of **RCW 42.17A** are to be construed liberally to effectuate the policies and purposes of that statute.

2) 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, the respondents have failed on numerous occasions to do this. *See final page.*

Furthermore, the political committee and its officers have failed to list how its remaining assets have been disposed of. This includes, but is not limited to, the money paid to its law firm.

It is unclear what work, if any, their law firm has performed for the committee beyond generating the attached form letter. \$5635.39 is an unreasonable price to pay for this work.

In addition, **PDC Report #100798573** was not filed correctly. Specifically, the following reported expenditure is not acceptable as a description for missing funds:

MATH CORRECTION 11/3/2017 \$78.86 OAK HARBOR WA 98277 MATH CORRECTION OF HISTORICAL DATA

If the balance of the bank account is off, the committee must identify the discrepancy and amend their reports to show accurate information.

3) State law requires that the committee treasurer preserve books of account, bills, receipts, and all other financial records of the campaign or political committee for not less than five calendar years following the year during which the transaction occurred. (Violation of RCW 42.17A.235 (6)).

On information and belief, I believe that Island County Democratic Central Committee and its officers have failed to abide by this requirement.

Their actions in this matter to date indicate an unwillingness to behave within the confines of the law. It is highly likely that they have engaged in intentional spoliation of evidence. They should immediately be instructed to preserve all financial records in accordance with state law.

The PDC should investigate the near certainty that the Island County Democratic Central Committee and its officers committed the above violations maliciously, willfully, in concert with others all of 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

**Island County Democratic Party
Response to PDC Complaint Filed 6/30/2017 by Glen Morgan**

July 26, 2017

To: Fox Blackhorn, Compliance Coordinator, PDC

From: Merri Huffine, Treasurer, Island County Democratic Party
icdtres@gmail.com

Below is our response to the PDC complaint filed on 6/30/17.

Allegation One: Alleged violations of RCW 42.17A.235 for failure to timely report contributions and expenditures. Exhibits A and B were provided by Mr. Morgan.

This allegation is correct. We were late in filing reports.

Late filing was due to repeated difficulties in finding and keeping a Treasurer. There was not good continuity of Treasurer's duties and training.

Plan/Procedures for moving forward:

1. Treasurer keeps a list of our reporting deadlines, and ensures these dates are in the Treasurer's calendar/schedule.
2. Each month the Treasurer will email a copy of our latest ORCA/PDC filing to our Chair. This will confirm that filing has been timely and accurate. As oversight, the Chair will watch for and expect this email each month.
3. As part of the Treasurer's report given to officers each month, Treasurer will again confirm that PDC filing was timely and accurate. Written meeting minutes will reflect this.
4. Designated backup person will file PDC reports in event of the absence/illness of Treasurer. We will keep on file a list of our former Treasurers who have experience with ORCA/PDC filings. If current Treasurer is not available or able to function at reporting time, he/she or the Chair will contact the first person on the backup list.
5. In the event of resignation of a Treasurer, the Chair will immediately appoint one of the backups to serve as Treasurer. Chair will appoint a new permanent Treasurer in a timely manner, so there will be good continuity of duties/training.
6. We have purchased a laptop for exclusive use of the treasurer in filing PDC reports. This will build continuity between successive treasurers, and we will be able to more easily access our past PDC filings.

Allegation Two: Alleged violations of RCS 42.17A.240 and WAC 390-05-295 for failure to timely report debts and obligations. Exhibit C was provided by Mr. Morgan.

With regard to timeliness of reporting, this allegation is correct. We were late in filing reports. See our response to Allegation One above, including our plan for moving forward.

With regard to reporting debts, we did not understand that we had any debt to report.

Our PDC reporting is consistent with common understanding of the word 'debt' which includes the idea that payments would occur over time and/or beyond a 30 day timeframe. In watching the online training provided by PDC, their example of a debt was a contract with a consultant. That makes sense. However, when a vendor has been directly paid timely, within 30 days, we don't see an outstanding debt. Also, in practical terms we often have a reimbursement situation. Reimbursement to volunteers for an authorized purchase could sometimes take time due to delay in getting the receipt into the treasurer's hands; but we paid our volunteers timely after receiving request for reimbursement. The original vendor was paid by the volunteer immediately at time of purchase, so we see no debt there.

We need further guidance and training from PDC, as the RCW is not easily understood in practical terms. Please advise.

Allegation Three: Alleged violations of RCW 42.17A.235 and WAC 390-16-205 for failure to provide detailed breakdowns of expenditures. Exhibit D was provided by Mr. Morgan.

This allegation is correct, with regard to Exhibit D which provides 18 line items of concern. We took the opportunity to review all our C4 entries for 2016 and 2017 and found that in many cases not enough purchase/vendor details had been provided. Corrections to descriptions/details have now been made, and amended C4 forms have been filed.

Plan/Procedures for moving forward:

We will continue to provide detailed breakdowns of purchases and vendors going forward.

Allegation Four: Alleged violation of RCW 42.17A.205 for failure to list all committee officers, in particular Treasurer Brea Wetzel.

This allegation is correct.

Ms. Wetzel was the duly appointed and elected treasurer of the Island County Democratic Party as reflected in meeting minutes of 6/1/16 and our organization's Bylaws, Article IV- Officers, paragraph 4.2: "Officers: The officers of the Central Committee shall consist of a Chair, 1st Vice Chair, 2nd Vice Chair, Secretary, Treasurer, State Committeeman and State Committeewoman."

Unfortunately on our 2016 C1PC form Ms. Wetzel was listed as Treasurer only in section #5 (Treasurer's name & address), but her name did not appear in section #7 (Committee

officers) because we incorrectly thought she only needed to be listed once on the form. We corrected the error and submitted an amended C1PC form for 2016 on 7/21/17.

Plan/Procedures for moving forward:

We now understand the C1PC form, and will continue to show the Treasurer's name in both section #5 and #7.

Allegation Five: Alleged violation of RCW 42.17A.425 for allegedly allowing illegal unauthorized expenditures of funds by an individual not listed as an officer on C1PC form, in particular Treasurer Brea Wetzel.

This allegation is not correct. Brea Wetzel was authorized to sign checks for purchases authorized by Chair/Executive Board. She was our Treasurer, i.e. also an officer. No unauthorized purchases were made by Ms. Wetzel.

Per our response to Allegation Four above, we were in error by not listing Ms. Wetzel on the C1PC form section #7 as an officer, and this was corrected with the amended C1PC form filed on 7/21/17.

Plan/Procedures for moving forward:

We now understand the C1PC form, and will continue to show the Treasurer's name in both section #5 and #7.

We appreciate the opportunity to respond to this PDC complaint. It has been a learning experience, and we now have a plan for moving forward.

Please contact me if there are any further questions or concerns.

EXHIBIT D Response from Island County Democrats

ORCA Transaction Descriptions Summary

7/26/17

ITEM #	DATE	ORCA DESCRIPTION LINE
1	8/19/16	Reimburse for Clinton campaign signs from 10th LD Democrats; vendor Capitol Press, Olympia.
2	10/31/16	Campaign ad in Whidbey News Times run date 10-26-16.
3	4/4/16	Vendor name is Max Hobbs Political Memorabilia. Description line comments: Buttons & bumper stickers.
4	4/4/16	Split this into 2 transactions for vendor Whidbey Weekly. Description line for \$395 item- Caucus ads run in Whidbey Weekly 3-3-16 & 3-17-16. For the \$240 item- Envelope print job.
5	7/27/16	Reimburse for Clinton campaign signs from 10th LD Democrats; vendor Capitol Press, Olympia.
6	5/5/16	Reimburse, office supplies purchased at Office Max, Walmart, Michaels & Staples. See Memo.
7	8/27/16	Reimburse for payment of print job; campaign flyers from Office Depot.
8	4/4/16	Check voided. See Memo/explanation for checks #943, 946 & 951.
9	12/2/16	Reimbursement for purchase of election night party supplies at Costco.
10	4/4/16	Reimbursement for caucus supplies purchased at Walmart & Office Max.
11	4/4/16	Related to item 8 above. Check #943 paid \$175 to Stanwood Camano School District for use of School District space for caucus. See Memo.
12	5/24/16	Reimbursement for convention supplies purchased at Office Depot, Haggen, & Papa Murphy,
13	10/27/16	Clinton campaign signs, printed by Capitol Press, Olympia, WA.
14	5/24/16	Reimbursement for purchase of convention supplies at Office Depot.
15	10/24/16	Reimbursement for brochure print job at Office Depot.
16	8/20/16	Campaign ad run date 7-14-16.
17	8/19/16	Reimbursement for food purchased at The Goose Community Grocer, for SummerFest event.
18	8/20/16	Reimbursement for office supplies purchased at Office Depot.

To Whom it May Concern --

It has come to my attention that the Island County Democratic Party has committed multiple violations of **RCW 42.17A** over a period of the last 3 years.

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, the Island County Democratic Party has failed on numerous occasions to do this. (**See Exhibits A - "Illegally late deposits and contributions" and Exhibit B "Illegally late reported expenditures"**). Please note that many of these contribution and expenditure reports are significantly late. This is particularly egregious and substantially out of compliance. Please also note that **at least \$30,592.30 of contributions were reported egregiously late (130 different contributions), and over \$27,563.15 in expenditures (76 different expenditures) were also reported extremely late.**

I have good reason to believe there are other contributions and expenditures that have been made by the Committee that have still not been reported.

Please note, it is likely that the only way the PDC will be able to unravel the truth about what donations or expenditures were actually made from this political committee would be to subpoena the bank statements and verify the check registry as well (Please note, allegation #4 below would also need to be clarified based on check signatory and which officers had and do have signing authority at the bank during this timeframe).

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. 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.

The Island County Democratic Party illegally failed to report the following debts: (**See Exhibit C - "Illegal failure to report debt"**)

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

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**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly.

The Island County Democratic Party illegally failed to break down the following expenses. (**See Exhibit D - "Illegal failure to break down expenditures"**)

4) Failure to list all committee officers. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

The Island County Democratic Party failed to list its treasurer (Brea Wetzel) as a committee officer, which is required by **RCW 42.17A.205(2)(c)**.

The above individual should have been listed as a committee officer, because she, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee" .

Please note that **RCW 42.17A.005 (35)** defines "person" as: "...an individual, partnership, joint venture, public or private corporation, association, federal, state, or local governmental entity or agency however constituted, candidate, committee, political committee, political party, executive committee thereof, or any other organization or group of persons, however organized."

5) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1PC form. (Violation of RCW 42.17A.425)

State law requires that: "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..."

Despite making decisions for the Committee, Brea Wetzel was not listed on the C1PC. In her role as Treasurer, Wetzel doubtlessly made illegal expenditures on behalf of the committee.

The PDC should investigate the possibility that the Island County Democratic Party 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

Exhibit A -- Illegally Late Reported/Deposited Contributions

Violation #	Contribution Date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
1	12/7/2015	1/11/2016	3/30/2017	444	\$19.45	PROCEEDS FROM LOW COST FUNDRAISER
2	12/11/2015	1/11/2016	3/30/2017	444	\$92.71	HOMOLA ANGIE
3	1/7/2016	2/10/2016	3/28/2017	412	\$100.00	HOMOLA ANGIE
4	1/7/2016	2/10/2016	3/28/2017	412	\$50.00	JAETHNING JANE
5	1/7/2016	2/10/2016	3/28/2017	412	\$100.00	BUDBILL MICHAEL MR
6	1/7/2016	2/10/2016	3/28/2017	412	\$50.00	RISNER MELODY
7	1/7/2016	2/10/2016	3/28/2017	412	\$100.00	PEOPLES LIONEL A SR
8	1/7/2016	2/10/2016	3/28/2017	412	\$40.00	MACLEAN MARJORIE C
9	1/7/2016	2/10/2016	3/28/2017	412	\$50.00	PROCEEDS FROM LOW COST FUNDRAISER
10	1/14/2016	2/10/2016	3/28/2017	412	\$22.00	Unitemized
11	1/7/2016	2/10/2016	3/28/2017	412	\$25.00	Unitemized
12	3/28/2016	4/11/2016	3/28/2017	351	\$50.00	MCCLAIN DIANE
13	3/28/2016	4/11/2016	3/28/2017	351	\$500.00	AZAR BETTY
14	3/28/2016	4/11/2016	3/28/2017	351	\$1,166.00	PROCEEDS FROM LOW COST FUNDRAISER
15	3/28/2016	4/11/2016	3/28/2017	351	\$824.75	PROCEEDS FROM LOW COST FUNDRAISER
16	3/28/2016	4/11/2016	3/28/2017	351	\$496.00	PROCEEDS FROM LOW COST FUNDRAISER
17	3/28/2016	4/11/2016	3/28/2017	351	\$150.75	PROCEEDS FROM LOW COST FUNDRAISER
18	3/28/2016	4/11/2016	3/28/2017	351	\$75.00	Unitemized
19	4/14/2016	5/11/2016	3/28/2017	321	\$92.71	HUFFINE MERRI T
20	4/18/2016	5/11/2016	3/28/2017	321	\$100.00	LAFOND CAROL
21	4/18/2016	5/11/2016	3/28/2017	321	\$100.00	ZACHARIAS JUNE L
22	4/14/2016	5/11/2016	3/28/2017	321	\$18.23	Unitemized
23	4/18/2016	5/11/2016	3/28/2017	321	\$50.00	Unitemized

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
24	5/2/2016	6/10/2016	3/29/2017	292	\$101.00	PROCEEDS FROM LOW COST FUNDRAISER
25	5/2/2016	6/10/2016	3/29/2017	292	\$50.00	BYNG WESTON H CAPT
26	5/2/2016	6/10/2016	3/29/2017	292	\$50.00	BYNG CAROLYN H
27	5/5/2016	6/10/2016	3/29/2017	292	\$118.55	GARDNER GEORGIA A
28	5/2/2016	6/10/2016	3/29/2017	292	\$45.00	Unitemized
29	6/8/2016	6/13/2016	3/29/2017	289	\$50.00	Unitemized
30	6/15/2016	6/20/2016	3/29/2017	282	\$1.03	Unitemized
31	6/24/2016	6/27/2016	3/29/2017	275	\$105.00	PROCEEDS FROM LOW COST FUNDRAISER
32	7/12/2016	7/18/2016	3/29/2017	254	\$100.00	JAEHNING JANE
33	7/12/2016	7/18/2016	3/29/2017	254	\$2,500.00	NORDHOFF NANCY
34	7/12/2016	7/18/2016	3/29/2017	254	\$250.00	KENDY DIANE
35	7/12/2016	7/18/2016	3/29/2017	254	\$50.00	FRANZEN SHARON
36	7/12/2016	7/18/2016	3/29/2017	254	\$300.00	MCKEE DOUG
37	7/12/2016	7/18/2016	3/29/2017	254	\$50.00	BRAVENDER DAVID
38	7/12/2016	7/18/2016	3/29/2017	254	\$50.00	GOLDBERG MARSHALL
39	7/12/2016	7/18/2016	3/29/2017	254	\$50.00	GOLDBERG CAROL
40	7/12/2016	7/18/2016	3/29/2017	254	\$75.00	Unitemized
41	6/1/2015	6/8/2015	2/15/2016	252	\$55.50	PROCEEDS FROM LOW COST FUNDRAISER
42	5/30/2015	6/10/2015	2/15/2016	250	\$55.50	PROCEEDS FROM LOW COST FUNDRAISER
43	7/22/2016	7/25/2016	3/29/2017	247	\$2,045.60	PROCEEDS FROM LOW COST FUNDRAISER
44	7/25/2016	8/1/2016	3/29/2017	240	\$92.71	DENSON ROSEMARY
45	7/25/2016	8/1/2016	3/29/2017	240	\$92.71	WILSON BRANDT
46	7/25/2016	8/1/2016	3/29/2017	240	\$8.92	KENNY ROBERT
47	8/1/2016	8/8/2016	3/29/2017	233	\$860.00	PROCEEDS FROM LOW COST FUNDRAISER
48	8/9/2016	8/15/2016	3/29/2017	226	\$246.93	PROCEEDS FROM LOW COST FUNDRAISER

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
49	8/12/2016	8/15/2016	3/29/2017	226	\$3,782.92	PROCEEDS FROM LOW COST FUNDRAISER
50	8/19/2016	8/22/2016	3/29/2017	219	\$46.16	EWELL TOM
51	8/19/2016	8/22/2016	3/29/2017	219	\$92.71	HARRIS LARRY
52	8/19/2016	8/22/2016	3/29/2017	219	\$32.19	KAPLAN JUDITH
53	9/1/2016	9/5/2016	3/29/2017	205	\$35.00	CHAPLIN SCOTT
54	9/1/2016	9/5/2016	3/29/2017	205	\$200.00	ENELL DEAN
55	9/1/2016	9/5/2016	3/29/2017	205	\$100.00	CAMMERMEYER MARGARETHE
56	9/1/2016	9/5/2016	3/29/2017	205	\$250.00	PICKARD JANICE
57	9/1/2016	9/5/2016	3/29/2017	205	\$50.00	CASE JERRY A
58	9/1/2016	9/5/2016	3/29/2017	205	\$50.00	KRAUSE DAVID
59	9/1/2016	9/5/2016	3/29/2017	205	\$50.00	TINGSTAD JACK P
60	9/1/2016	9/5/2016	3/29/2017	205	\$50.00	TAMLER CAROLYN
61	9/1/2016	9/5/2016	3/29/2017	205	\$113.00	PROCEEDS FROM LOW COST FUNDRAISER
62	9/2/2016	9/5/2016	3/29/2017	205	\$46.16	ROOMES JOANN K
63	9/2/2016	9/5/2016	3/29/2017	205	\$125.00	PROCEEDS FROM LOW COST FUNDRAISER
64	8/31/2016	9/5/2016	3/29/2017	205	\$22.89	Unitemized
65	9/1/2016	9/5/2016	3/29/2017	205	\$60.00	Unitemized
66	7/25/2015	7/27/2015	2/15/2016	203	\$50.00	TAMLER CAROLYN
67	7/25/2015	7/27/2015	2/15/2016	203	\$140.00	FULGHAM DUANE
68	7/25/2015	7/27/2015	2/15/2016	203	\$100.00	JOHNSON HELEN P
69	7/25/2015	7/27/2015	2/15/2016	203	\$135.00	CAMMERMEYER MARGARETHE
70	7/25/2015	7/27/2015	2/15/2016	203	\$100.00	BENNETT SHIRLEY
71	7/25/2015	7/27/2015	2/15/2016	203	\$75.00	HOMOLA ANGIE
72	7/25/2015	7/27/2015	2/15/2016	203	\$40.00	WAGNER REBECCA
73	7/25/2015	7/27/2015	2/15/2016	203	\$40.00	WILSON STANLEY
74	7/25/2015	7/27/2015	2/15/2016	203	\$40.00	SANDFORD M. K DR
75	7/25/2015	7/27/2015	2/15/2016	203	\$50.00	JAEHNING JANE
76	7/25/2015	7/27/2015	2/15/2016	203	\$30.00	KREZ CAROL
77	7/25/2015	7/27/2015	2/15/2016	203	\$30.00	FICK PAMELA

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
78	7/25/2015	7/27/2015	2/15/2016	203	\$1,533.00	CONTRIBUTIONS SMALL
79	7/20/2015	7/27/2015	2/15/2016	203	\$50.00	PROCEEDS FROM LOW COST FUNDRAISER
80	7/25/2015	7/27/2015	2/15/2016	203	\$125.00	Unitemized
81	9/7/2016	9/12/2016	3/29/2017	198	\$50.00	GIVE ANA D
82	9/7/2016	9/12/2016	3/29/2017	198	\$20.00	PROCEEDS FROM LOW COST FUNDRAISER
83	9/7/2016	9/12/2016	3/29/2017	198	\$200.00	HYDE JOHN
84	7/31/2015	8/3/2015	2/15/2016	196	\$100.00	UTOPIA BLUE
85	8/5/2015	8/10/2015	2/15/2016	189	\$50.00	JAEHNING JANE
86	8/6/2015	8/10/2015	2/15/2016	189	\$740.90	PROCEEDS FROM LOW COST FUNDRAISER
87	8/7/2015	8/10/2015	2/15/2016	189	\$613.46	PROCEEDS FROM LOW COST FUNDRAISER
88	8/8/2015	8/10/2015	2/15/2016	189	\$1,440.82	PROCEEDS FROM LOW COST FUNDRAISER
89	8/9/2015	8/10/2015	2/15/2016	189	\$929.14	PROCEEDS FROM LOW COST FUNDRAISER
90	1/23/2015	2/10/2015	8/16/2015	187	\$1,000.00	AZAR BETTY
91	1/30/2015	2/10/2015	8/16/2015	187	\$25.00	Unitemized
92	9/22/2016	9/26/2016	3/29/2017	184	\$100.00	LAFOND CAROL
93	9/22/2016	9/26/2016	3/29/2017	184	\$50.00	GOODWIN SALLY
94	9/22/2016	9/26/2016	3/29/2017	184	\$46.16	ROOMES JOANN K
95	8/11/2015	8/17/2015	2/16/2016	183	\$200.00	Unitemized
96	9/30/2016	10/3/2016	3/29/2017	177	\$1,000.00	POWER LEIGH
97	8/21/2015	8/24/2015	2/15/2016	175	\$263.83	Unitemized
98	10/3/2016	10/10/2016	3/29/2017	170	\$46.16	PRICE CHARLTON
99	10/3/2016	10/10/2016	3/29/2017	170	\$30.00	READ DOROTHY G
100	10/3/2016	10/10/2016	3/29/2017	170	\$50.00	HANNAHAN JAMES
101	10/3/2016	10/10/2016	3/29/2017	170	\$217.00	PROCEEDS FROM LOW COST FUNDRAISER
102	10/3/2016	10/10/2016	3/29/2017	170	\$50.00	DAWES CAROLE E

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
103	10/3/2016	10/10/2016	3/29/2017	170	\$20.00	Unitemized
104	10/11/2016	10/17/2016	3/29/2017	163	\$20.00	PROCEEDS FROM LOW COST FUNDRAISER
105	10/14/2016	10/17/2016	3/29/2017	163	\$92.71	PACKER LOC
106	10/14/2016	10/17/2016	3/29/2017	163	\$22.88	KENNY ROBERT
107	2/27/2015	3/10/2015	8/16/2015	159	\$25.00	BRENCICK MARY
108	10/25/2016	10/31/2016	3/29/2017	149	\$50.00	TAMLER CAROLYN
109	10/27/2016	10/31/2016	3/29/2017	149	\$1,000.00	PUGET PAC
110	10/27/2016	10/31/2016	3/29/2017	149	\$50.00	NAGEL HENRY J
111	10/27/2016	10/31/2016	3/29/2017	149	\$200.00	PRICE-JOHNSON HELEN MS
112	10/27/2016	10/31/2016	3/29/2017	149	\$30.00	BENNETT SHIRLEY
113	10/27/2016	10/31/2016	3/29/2017	149	\$30.00	MOORE R.A.
114	10/27/2016	10/31/2016	3/29/2017	149	\$55.00	PROCEEDS FROM LOW COST FUNDRAISER
115	10/1/2015	10/5/2015	2/15/2016	133	\$950.00	TOM RIGGS CAMPAIGN
116	3/6/2015	4/10/2015	8/16/2015	128	\$25.00	Unitemized
117	11/17/2016	12/10/2016	3/29/2017	109	\$46.16	MCINTYRE GARY
118	11/29/2016	12/10/2016	3/29/2017	109	\$40.00	PROCEEDS FROM LOW COST FUNDRAISER
119	10/31/2015	11/2/2015	2/15/2016	105	\$200.00	WHIDBEY ISLAND DEMOCRATIC CLUB
120	12/15/2016	1/10/2017	3/29/2017	78	\$25.00	ROOMES JOANN K
121	1/18/2017	2/10/2017	3/22/2017	40	\$100.00	ROBNETT MARGARET
122	1/18/2017	2/10/2017	3/22/2017	40	\$100.00	CHAPLIN SCOTT
123	1/18/2017	2/10/2017	3/22/2017	40	\$173.00	PROCEEDS FROM LOW COST FUNDRAISER
124	1/18/2017	2/10/2017	3/22/2017	40	\$50.00	Unitemized
125	1/31/2017	2/10/2017	3/22/2017	40	\$20.00	Unitemized
126	2/24/2017	3/10/2017	3/22/2017	12	\$75.00	ROOMES JOANNE
127	2/24/2017	3/10/2017	3/22/2017	12	\$50.00	COLLINS KRISTINE N
128	2/24/2017	3/10/2017	3/22/2017	12	\$100.00	ROSE MADELINE
129	2/24/2017	3/10/2017	3/22/2017	12	\$250.00	AZAR BETTY S
130	2/24/2017	3/10/2017	3/22/2017	12	\$250.00	HARRIS LARRY

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
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Total #####

Exhibit B -- Illegally Late Reported Expenditures

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
1	1/11/2016	2/10/2016	3/28/2017	412	ISLAND COUNTY HEALTH DEPT	\$ 144.00	ANNUAL HELTH PERMIT
2	2/23/2016	3/10/2016	3/28/2017	383	U.S. POSTMASTER	\$ 102.00	PO BOX RENTAL
3	2/16/2016	3/10/2016	3/28/2017	383	WHIDBEY ISLAND AREA FAIR	\$ 850.00	BOOTH RENTAL
4	4/4/2016	5/11/2016	3/28/2017	321	MAX HOBBS	\$ 806.50	BUTTONS AND BUMPER STICKERS
5	4/4/2016	5/11/2016	3/28/2017	321	MCINTYRE GARY	\$ 261.28	CAUCUS SUPPLIES
6	4/4/2016	5/11/2016	3/28/2017	321	RISNER MELODY	\$ 320.00	CAUCUS SUPPLIES
7	4/4/2016	5/11/2016	3/28/2017	321	RISNER MELODY	\$ 235.00	CAUCUS SPACE RENTAL
8	4/4/2016	5/11/2016	3/28/2017	321	OAK HARBOR SCHOOL DISTRICT #201	\$ 150.00	CAUCUS SPACE
9	4/4/2016	5/11/2016	3/28/2017	321	WHIDBEY WEEKLY	\$ 635.00	CAMPAIGN AD
10	4/4/2016	5/11/2016	3/28/2017	321	STANWOOD-CAMANO SCHOOL DISTRICT #401	\$ 175.00	CAUCUS RENTAL
11	4/27/2016	5/11/2016	3/28/2017	321	COUPEVILLE CHAMBER OF COMMERCE	\$ 75.00	PARADE FEE, MEM DAY
12	4/27/2016	5/11/2016	3/28/2017	321	U.S. POSTMASTER	\$ 215.00	BULK MAIL PERMIT

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
13	4/27/2016	5/11/2016	3/28/2017	321	U.S. POSTMASTER	\$ 20.00	POSTAGE DEPOSIT
14	5/1/2016	6/10/2016	3/29/2017	292	EXPENSES OF \$50 OR LESS	\$ 52.67	Unitemized
15	5/24/2016	6/10/2016	3/29/2017	292	SOUTH WHIDBEY SCHOOL DISTRICT	\$ 342.00	CONVENTION BREAK OUT ROOM
16	5/24/2016	6/10/2016	3/29/2017	292	HUFFINE ARTHUR C	\$ 226.25	CONVENTION MATERIALS
17	5/24/2016	6/10/2016	3/29/2017	292	HUFFINE ARTHUR C	\$ 157.24	CONVENTION SUPPLIES
18	5/5/2016	6/10/2016	3/29/2017	292	RISNER MELODY	\$ 380.00	CAUCUS SUPPLIES
19	5/24/2016	6/10/2016	3/29/2017	292	WHIDBEY CHILDRENS THEATRE	\$ 550.00	COUNTY CONVENTION MEETING ROOM
20	6/1/2016	7/12/2016	3/29/2017	260	EXPENSES OF \$50 OR LESS	\$ 20.00	Unitemized
21	6/3/2016	7/12/2016	3/29/2017	260	OAK HARBOR CHAMBER OF COMMERCE	\$ 180.00	4TH OF JULY PARADE AND BOOTH RENTAL

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
22	7/17/2016	7/26/2016	3/29/2017	246	LIBERTY NORTHWEST INSURANCE	\$ 411.00	ANNUAL PREMIUM
23	7/25/2016	7/26/2016	3/29/2017	246	GOOSE COMMUNITY GROCER	\$ 612.45	SUMMERFEST FOOD & SUPPLIES
24	7/1/2015	7/14/2015	2/16/2016	217	EXPENSES OF \$50 OR LESS	\$ 10.45	Unitemized
25	7/1/2015	7/14/2015	2/16/2016	217	OAK HARBOR CHAMBER OF COMMERCE	\$ 205.00	ANNUAL MEMBERSHIP FEE
26	6/10/2015	7/14/2015	2/15/2016	216	OAK HARBOR CHAMBER OF COMMERCE	\$ 200.00	BOOTH & PARADE FEE OH 4TH OF JULY
27	6/10/2015	7/14/2015	2/15/2016	216	LIBERTY INSURANCE	\$ 411.00	INSURANCE JULY 5, 2015 - JULY 2, 2016
28	7/16/2015	7/28/2015	2/16/2016	203	CITY OF LANGLEY	\$ 60.00	CITY LICENSE FEES FOR FAIR
29	7/16/2015	7/28/2015	2/16/2016	203	HUFFINE ARTHUR C	\$ 130.19	CANOPY REIMBURSEMENT
30	7/25/2015	7/28/2015	2/16/2016	203	THE GOOSE	\$ 568.75	FOOD FOR SUMMERFEST

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
31	7/27/2016	9/12/2016	3/29/2017	198	HUFFINE ARTHUR C	\$ 500.00	CLINTON SIGNS
32	8/11/2016	9/12/2016	3/29/2017	198	TOWN OF COUPEVILLE	\$ 130.00	ELECTION NIGHT PARTY
33	8/19/2016	9/12/2016	3/29/2017	198	WHIDBEY SIGN CO.	\$ 283.71	BANNERS FOR FAIR
34	8/20/2016	9/12/2016	3/29/2017	198	WHIDBEY WEEKLY	\$ 140.00	ADD
35	8/22/2016	9/12/2016	3/29/2017	198	HOMOLA ANGIE	\$ 200.00	CAMPAIGN CONTRIBUTION
36	7/26/2016	9/12/2016	3/29/2017	198	EXPENSES OF \$50 OR LESS	\$ 60.22	Unitemized
37	8/19/2016	9/12/2016	3/29/2017	198	ANOMOSA MARTI	\$ 1,385.78	FOOD FOR FAIR
38	8/27/2016	9/12/2016	3/29/2017	198	POWER LEIGH	\$ 344.35	CAMPAIGN LITERATURE
39	8/20/2016	9/12/2016	3/29/2017	198	TAMLER CAROLYN	\$ 62.00	OFFICE SUPPLIES
40	8/19/2016	9/12/2016	3/29/2017	198	TAMLER CAROLYN	\$ 129.80	FOOD FOR SUMMERFEST
41	1/1/2015	2/28/2015	8/16/2015	169	EXPENSES OF \$50 OR LESS	\$ 2.11	Unitemized
42	1/26/2015	2/28/2015	8/16/2015	169	ISLAND COUNTY HEALTH	\$ 144.00	FAIR
43	1/23/2015	2/28/2015	8/16/2015	169	BLUE UTOPIA	\$ 69.39	BLUE UTOPIA FEE

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
44	9/1/2016	10/18/2016	3/29/2017	162	HOMOLA ANGIE	\$ 4,000.00	CAMPAIGN CONTRIBUTION
45	9/1/2016	10/18/2016	3/29/2017	162	EXPENSES OF \$50 OR LESS	\$ 24.65	Unitemized
46	9/1/2016	10/18/2016	3/29/2017	162	FOWKES JOHN	\$ 1,000.00	CAMPAIGN CONTRIBUTION
47	9/13/2016	10/18/2016	3/29/2017	162	BREVOORT DORIS	\$ 2,000.00	CAMPAIGN CONTRIBUTION
48	9/1/2016	10/18/2016	3/29/2017	162	PRICE-JOHNSON HELEN MS	\$ 1,000.00	CAMPAIGN CONTRIBUTION
49	2/1/2015	3/10/2015	8/16/2015	159	EXPENSES OF \$50 OR LESS	\$ 2.11	Unitemized
50	2/26/2015	3/10/2015	8/16/2015	159	USPS	\$ 92.00	PO BOX
51	8/9/2015	9/10/2015	2/16/2016	159	DICKE DIANE	\$ 295.90	FOOD FOR FAIR BOOTH
52	8/1/2015	9/10/2015	2/16/2016	159	EXPENSES OF \$50 OR LESS	\$ 42.00	Unitemized
53	8/5/2015	9/10/2015	2/16/2016	159	PETTY CASH	\$ 200.00	CHANGE FUND FOR FAIR
54	8/10/2015	9/10/2015	2/16/2016	159	K BRIAN	\$ 831.60	FOOD FOR FAIR
55	8/10/2015	9/10/2015	2/16/2016	159	ISLAND COUNTY FAIR	\$ 574.89	20% FEE TO FAIR

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
56	10/27/2016	11/1/2016	3/29/2017	148	10TH LD DEMOCRATRS	\$ 200.00	HILLARY SIGNS
57	10/24/2016	11/1/2016	3/29/2017	148	POWER LEIGH	\$ 143.04	BROCHURES
58	10/27/2016	11/1/2016	3/29/2017	148	WHIDBEY NEWS TIMES	\$ 937.93	CAMPAIGN ADS
59	3/1/2015	4/10/2015	8/16/2015	128	EXPENSES OF \$50 OR LESS	\$ 2.11	Unitemized
60	3/5/2015	4/10/2015	8/16/2015	128	SNO-ISLE FOUNDATION	\$ 100.00	TRUDY SUNDBERG BENEFIT
61	3/5/2015	4/10/2015	8/16/2015	128	WICA	\$ 100.00	IN MEMORY OF PAUL FOURNIER
62	9/1/2015	10/13/2015	2/16/2016	126	POWER LEIGH	\$ 100.00	RACK CARDS
63	9/1/2015	10/13/2015	2/16/2016	126	WA STATE DEPT OF REVENUE	\$ 250.07	FAIR SALES TAXES
64	9/1/2015	10/13/2015	2/16/2016	126	GEORGIA GARDNER CAMPAIGN	\$ 500.00	CONTRIBUTION TO GEORGIA GARDNER CAMPAIGN

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
65	9/1/2015	10/13/2015	2/16/2016	126	BENNETT SHIRLEY	\$ 267.32	POLITICAL BOOTH CONTRIBUTIONS TO WIDC
66	11/25/2016	12/12/2016	3/29/2017	107	COACHMAN INN	\$ 149.45	ROOM RENTAL ELECTION NIGHT PARTY
67	4/3/2015	5/11/2015	8/16/2015	97	OAK HARBOR CHAMBER OF COMMERCE	\$ 100.00	HOLLAND HAPPENINGS BOOTH
68	12/2/2016	1/10/2017	3/30/2017	79	HUFFINE ARTHUR C	\$ 262.49	ELECTION NIGHT PARTY SUPPLIES
69	5/7/2015	6/10/2015	8/16/2015	67	WHIDBEY ISLAND FAIR	\$ 1,100.00	2 BOOTHS AT FAIR
70	5/1/2015	6/10/2015	8/16/2015	67	EXPENSES OF \$50 OR LESS	\$ 50.00	Unitemized
71	1/1/2017	2/10/2017	3/22/2017	40	EXPENSES OF \$50 OR LESS	\$ 2.16	Unitemized
72	1/18/2017	2/10/2017	3/22/2017	40	COMPUTER CONCEPTS	\$ 527.03	COMPUTER PURCHASE

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description
73	2/1/2017	3/10/2017	3/22/2017	12	WHIDBEY ISLAND FAIR	\$ 425.00	FAIR BOOTH RENTAL DEPOSIT
74	2/27/2017	3/10/2017	3/22/2017	12	US POSTAL SERVICE	\$ 112.00	PO BOX RENTAL FOR ONE YEAR
75	2/24/2017	3/10/2017	3/22/2017	12	ISLAND COUNTY PUBLIC HEALTH	\$ 144.00	FOOD ESTABLISH MENT LICENSE FOR FAIR
76	2/1/2017	3/10/2017	3/22/2017	12	EXPENSES OF \$50 OR LESS	\$ 70.26	Unitemize d

Exhibit C -- Illegal Failure to Report Debt

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
1	HUFFINE ARTHUR C	2016-12-02	\$ 262.49	ELECTION NIGHT PARTY SUPPLIES	This should have been reported as debt on the C4 covering the time period of November.
2	WHIDBEY NEWS TIMES	2016-10-27	\$ 937.93	CAMPAIGN ADS	This should have been reported as debt on the 21 day pre-general C4.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
3	POWER LEIGH	2016-08-27	\$ 344.35	CAMPAIGN LITERATURE	This should have been reported as debt on the 7-day pre-primary C4.
4	ANOMOSA MARTI	2016-08-19	\$ 1,385.78	FOOD FOR FAIR	This should have been reported as debt on the 7-day pre-primary C4.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
5	WHIDBEY SIGN CO.	2016-08-19	\$ 283.71	BANNERS FOR FAIR	This should have been reported as debt on the 7-day pre-primary C4.
6	HUFFINE ARTHUR C	2016-07-27	\$ 500.00	CLINTON SIGNS	This should have been reported as debt on the 7-day pre-primary C4.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
7	GOOSE COMMUNITY GROCER	2016-07-25	\$ 612.45	SUMMERFEST FOOD & SUPPLIES	This should have been reported on 21-day pre-primary C4.
8	LIBERTY NORTHWEST INSURANCE	2016-07-17	\$ 411.00	ANNUAL PREMIUM	This should have been reported as debt on 21 day pre-primary C4.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
9	WHIDBEY CHILDRENS THEATRE	2016-05-24	\$ 550.00	COUNTY CONVENTION MEETING ROOM	This should have been reported as debt on the C4 covering the time period of April.
10	SOUTH WHIDBEY SCHOOL DISTRICT	2016-05-24	\$ 342.00	CONVENTION BREAK OUT ROOM	This should have been reported as debt on the C4 covering the time period of April.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
11	RISNER MELODY	2016-05-05	\$ 380.00	CAUCUS SUPPLIES	This should have been reported as debt on the C4 covering the time period of April.
12	MAX HOBBS	2016-04-04	\$ 806.50	BUTTONS AND BUMPER STICKERS	This should have been reported as debt on the C4 covering the time period of March.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
13	WHIDBEY WEEKLY	2016-04-04	\$ 635.00	CAMPAIGN AD	This should have been reported as debt on the C4 covering the time period of March.
14	RISNER MELODY	2016-04-04	\$ 320.00	CAUCUS SUPPLIES	This should have been reported as debt on the C4 covering the time period of March.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
15	MCINTYRE GARY	2016-04-04	\$ 261.28	CAUCUS SUPPLIES	This should have been reported as debt on the C4 covering the time period of March.
16	WHIDBEY ISLAND AREA FAIR	2016-02-16	\$ 850.00	BOOTH RENTAL	This should have been reported as debt on the C4 covering the time period of January.
		Total	\$ 8,882.49		

Exhibit D -- Illegal Failure to breakdown expenditures.

Violation #	Vendor	Date	Amount	Description	Failure to breakdown expenditure.
1	ANOMOSA MARTI	2016-08-19	\$ 1,385.78	FOOD FOR FAIR	Failure to identify where food was purchased.
2	WHIDBEY NEWS TIMES	2016-10-27	\$ 937.93	CAMPAIGN ADS	Failure to include run date of advertisement.
3	MAX HOBBS	2016-04-04	\$ 806.50	BUTTONS AND BUMPER STICKERS	Failure to identify vendor who printed button and bumper stickers.
4	WHIDBEY WEEKLY	2016-04-04	\$ 635.00	CAMPAIGN AD	Failure to include run date of advertisement.
5	HUFFINE ARTHUR C	2016-07-27	\$ 500.00	CLINTON SIGNS	Failure to identify vendor who printed the Clinton signs.
6	RISNER MELODY	2016-05-05	\$ 380.00	CAUCUS SUPPLIES	Failure to identify vendor that caucus supplies were purchased from.
7	POWER LEIGH	2016-08-27	\$ 344.35	CAMPAIGN LITERATURE	Failure to identify vendor that campaign literature was purchased from.
8	RISNER MELODY	2016-04-04	\$ 320.00	CAUCUS SUPPLIES	Failure to identify vendor that caucus supplies were purchased from.
9	HUFFINE ARTHUR C	2016-12-02	\$ 262.49	ELECTION NIGHT PARTY SUPPLIES	Failure to identify vendor that supplies were purchased from.
10	MCINTYRE GARY	2016-04-04	\$ 261.28	CAUCUS SUPPLIES	Failure to identify vendor that caucus supplies were purchased from.
11	RISNER MELODY	2016-04-04	\$ 235.00	CAUCUS SPACE RENTAL	Failure to identify which vendor actually received this money for caucus space rental.
12	HUFFINE ARTHUR C	2016-05-24	\$ 226.25	CONVENTION MATERIALS	Failure to identify vendor that actually printed the convention materials.

Violation #	Vendor	Date	Amount	Description	Failure to breakdown expenditure.
13	10TH LD DEMOCRATRS	2016-10-27	\$ 200.00	HILLARY SIGNS	Failure to identify vendor who printed the Clinton signs.
14	HUFFINE ARTHUR C	2016-05-24	\$ 157.24	CONVENTION SUPPLIES	Failure to identify vendor that convention supplies were purchased from.
15	POWER LEIGH	2016-10-24	\$ 143.04	BROCHURES	Failure to identify vendor that printed the brochures.
16	WHIDBEY WEEKLY	2016-08-20	\$ 140.00	ADD	Failure to include run date of advertisement.
17	TAMLER CAROLYN	2016-08-19	\$ 129.80	FOOD FOR SUMMERFEST	Failure to identify where food was purchased.
18	TAMLER CAROLYN	2016-08-20	\$ 62.00	OFFICE SUPPLIES	Failure to identify vendor that office supplies were purchased from.

Total \$ 7,126.66

☐ Expedite
☒ No hearing set
☐ Hearing is set
Date:
Time:
Judge/Calendar: Lanese

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THURSTON COUNTY

STATE OF WASHINGTON ex rel. GLEN
MORGAN,

Plaintiff,

v.

ISLAND CO. DEMOCRATIC CENTRAL
COMMITTEE (a political committee),

Defendant.

No. 17-2-04836-34

**NOTICE OF INTENT
TO WITHDRAW**

TO: Clerk of the Court;

AND TO: All Counsel of Record

NOTICE IS HEREBY GIVEN that Dmitri Iglitzin, Laura Ewan, and the law firm of Schwerin Campbell Barnard Iglitzin & Lavitt, LLP intends to withdraw as attorneys of record for Defendant Island County Democratic Central Committee PAC as of February 22, 2017. This withdrawal shall be effective without court order unless an objection to the withdrawal is served upon the withdrawing attorneys prior to March 5, 2018.

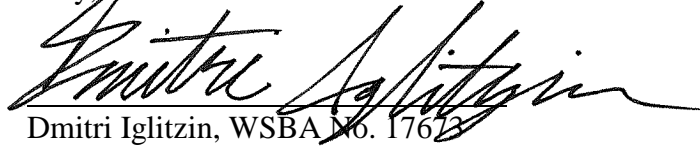
The last known address for Defendant Island County Democratic Central Committee PAC is as follows: P.O. Box 775, Oak Harbor, WA 98277; 1349 51st Place NE, Auburn, Washington 98002.

NOTICE OF INTENT TO WITHDRAW
Case No. No. 17-2-04836-34

LAW OFFICES OF
SCHWERIN CAMPBELL
BARNARD IGLITZIN & LAVITT, LLP
18 WEST MERCER STREET SUITE 400
SEATTLE, WASHINGTON 98119-3971
(206) 285-2828

1 Pursuant to CR 71(c)(2), proof of mailing of the instant Notice to the Defendant is
2 enclosed.

3 DATED this 22nd day of February, 2018.

4 

5 Dmitri Iglitzin, WSBA No. 17613

6 Laura Ewan, WSBA No. 45201

7 SCHWERIN CAMPBELL BARNARD

8 IGLITZIN & LAVITT LLP

9 18 W Mercer St, Suite 400

10 Seattle, WA 98119

11 Phone: (206) 257-6003

12 Fax: (206) 257-6038

13 *iglitzin@workerlaw.com*

14 *ewan@workerlaw.com*

15 *Attorneys for Defendants*

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NOTICE OF INTENT TO WITHDRAW
Case No. No. 17-2-04836-34

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DECLARATION OF SERVICE

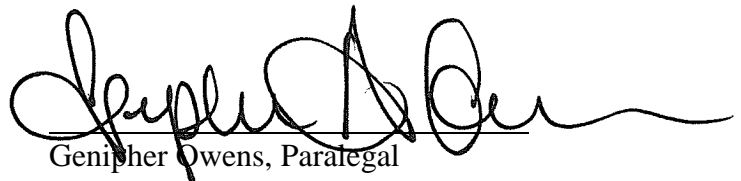
I, Genipher Owens, hereby declare under penalty of perjury under the laws of the state of Washington that on February 22, 2018, I caused the foregoing Notice of Intent to Withdraw to be filed with the Thurston County Superior Court via the online filing system, and a true and correct copy of the same to be sent via email and US First Class mail to:

Nicholas Power
The Law Office of Nicholas Power
540 Guard St, Suite 150
Friday Harbor, WA 98250
nickedpower@gmail.com

Island County Democratic Central Committee PAC
P.O. Box 775
Oak Harbor, WA 98277
icdchair@gmail.com

Island County Democratic Central Committee PAC
1349 51st Place NE
Auburn, Washington 98002.
icdchair@gmail.com

Signed in Seattle, Washington, this 22nd day of February, 2018.


Genipher Owens, Paralegal

Schwerin Campbell Barnard Iglitzin & Lavitt LLP

ATTORNEYS AT LAW

Of Counsel Lawrence Schwerin

James D. Oswald

LAURA EWAN
ewan@workerlaw.com

Sent via email to nickedpower@gmail.com

November 3, 2017

Nicholas Power
Attorney at Law
540 Guard, Suite 150
Friday Harbor, WA 98250

Re: State of Washington, ex rel. Glen Morgan v. Island County Democratic Committee (a political committee)
Thurston Co. Cause No. 17-2-04836-36
Our File No. 6552-012

Dear Mr. Power:

The purpose of this letter is to inform you about some recent developments pertinent to this case.

The Island County Democratic Committee PAC does not expect to be receiving contributions or making expenditures in support of, or opposition to, any candidate or ballot measure. Accordingly, it has complied with the procedures provided by the PDC to wind down operations and, as of today, the Island County Democratic Committee PAC no longer exists as a political committee. *See* RCW 42.17A.010(37).

Because the Island County Democratic Committee PAC has disbanded, it will not be filing an answer in this matter. We therefore suggest that you advise your client to promptly seek a voluntary dismissal of any and all claims he has against the Committee.

We are aware you have incurred attorney fees to date and that the prevailing party in actions brought under the Fair Campaign Practices Act ("FCPA") is entitled to an award of attorney fees. However, a "fee award must be reasonable in relation to the results obtained." *Ethridge v. Hwang*, 105 Wn. App. 447, 20 P.3d 958 (2001) (quotation marks omitted).

Knowingly incurring additional fees by pursuing further litigation against a now-defunct entity is clearly not "reasonable," for the purposes of a fee award. We therefore reiterate our recommendation that your client seek dismissal of the case as soon as possible.

Letter to Nicholas Power
November 3, 2017
Page 2 of 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Ewan', with a large, stylized initial 'L'.

Laura Ewan

*Counsel for Island County Democratic
Central Committee*

cc: Linda Dalton (*via email*)
Fox Blackhorn (*via email*)