

As a preface for this complaint, the candidate originally filed a series of handwritten C3 and C4 submissions in violation of RCW 42.17A.245. Case number 6650 was submitted to the PDC in response to this violation as well as uncertainty in the figures provided in the associated C3 and C4 filings. It would appear that in response to the complaint, the campaign has submitted a series of revised filings electronically. Unless otherwise noted, this complaint considers the most recent amended electronic submissions as the intended certified financial statements for the candidate's campaign.

Issues and Discrepancies

A. Amended C4 (Doc# 100709723) for the period 5/13 - 5/31/16:

Issue 1: Line 1 shows a previous total cash balance of cash and in-kind contributions of \$29,318.58. An examination of the individual C3 filings indicates the total amount of cash on-hand should be \$1,000. This assertion is based upon C3 (Doc# 100709462) with a which identifies a funds receipt date of 5/3/15. No other C3 submissions show receipt dates within the reporting period.

A further issue arises, and perhaps more a question of general disclosure policy – The date of the first disclosed transaction occurred prior to the statutory reporting period of May 13 - 31. While the campaign did indeed disclose a transaction occurring prior to this reporting window, it calls into question whether specific guidelines are published for reporting such early campaign activities.

Issue 2: Schedule B for this filing shows two contributions from the candidate himself totaling \$318.72. However, the column for Aggregate Total for the shows an amount of \$29,637.30. Further, the aggregate totals for the itemized contributions did not increase with the subsequent contribution.

Issue 3: Line 10 shows previous cash expenditures of \$28,318.58. Again, it is unclear where the source of these prior expenses were derived from or how they were expended, if at all.

Issue 4: There is a \$5,000 discrepancy between line 19 of this submission and line 19 of the original handwritten C4 intended for the same reporting period received by the PDC on June 10, 2016. Specifically, the original submission denoted an outstanding loan balance of \$6,000. While Schedule L of that original filing appears to have inadvertently shown the loan as a payment rather than a receipt, it demonstrates that the campaign acknowledged the receipt cash funds in the amount of \$6,000 on May 2.

Moreover, and perhaps the greatest area of concern over this issue is the fact that subsequent C3 filings (see Doc#'s 100709462, 100709463 and 100709460) denote a total of three loans totaling \$6,000 were made to the campaign over a 49-day period, rather than a single loan issued on May 2 as previously declared.

Issue 5: Schedule A does not provide information in the column "Code". Accordingly, election summary information prepared by the PDC may be in error.

B. Amended C4 (Doc# 100709477) for the period 6/1 – 7/11/2016:

Issue 1: Similar to above, the starting balance on Line 1 does not appear to have any correlation to previous filings nor to any combination of cash or loan contributions and/or in kind contributions identified in associated C3 filings for this reporting period.

Issue 2: The amount of \$52,447.00 shown in Line 2 appears to be in error. A detailed examination of C3 filings for the reporting period show a total of \$53,351.00 in loans and contributions were received within the reporting period. Please see table below:

Date	Contributor	Type	PDC Report Date	PDC Doc #	Amount
6/6/2016	Andrews Vineyard	Cash	7/19/2016	100709458	\$ 1,000.00
6/21/2016	Powell Christensen	Cash	7/19/2016	100709459	\$ 100.00
6/3/2016	Warren Barmore	Cash	7/19/2016	100709457	\$ 125.00
6/4/2016	Marjorie Barmore	Cash	7/20/2016	100709458	\$ 126.00
5/3/2016	Bill Jenkin	Loan	7/19/2016	100709462	\$ 1,000.00
6/3/2016	Bill Jenkin	Loan	7/19/2016	100709463	\$ 1,000.00
6/21/2016	Bill Jenkin	Cash	7/19/2016	100709460	\$ 26,000.00
6/21/2016	Bill Jenkin	Loan	7/19/2016	100709460	\$ 4,000.00
7/7/2016	Bill Jenkin	Cash	7/19/2016	100709461	\$ 20,000.00
					\$ 53,351.00

Issue 3: Listed on Schedule B, there is a substantial in kind contribution in the amount of \$2,375.00 described as, “Commercial ad”. It does not disclose whether this was broadcast media or otherwise nor who the vendor was. The question then arises as to whether the amount (however modest) is properly aggregated in the election summary information prepared by the PDC as no expense code is associated with it.

Issue 4: All of the contributions listed on Schedule B were made by the candidate and yet the Aggregate Totals do not change. Moreover, the totals shown for this period are less than the totals for the previous reporting period. Assuming ORCA software was used in the preparation of these filings, this issue, like that of item A2 above, is of particular concern as the software (properly used) would have correctly captured and reported the incrementing amounts accordingly.

Issue 5: There is no Schedule C provided in this amended report. However, a prior handwritten C4 for this identical reporting period (see the C4 report received by the PDC on July 11) identified contribution refunds totaling \$1,800.00. The absence of these corrections coupled with the erroneous figures provided in the starting cash balances of both the amended C4 submissions makes it impossible to determine the actual contributions received. (Please see item “C” below for a related issue).

Issue 6: Schedule A shows an expense in the amount of \$117.00 for website design was incurred in June. This expense was previously denoted in the May reporting period.

Issue 7: Schedule A does not provide information in the column “Code”. Accordingly, election summary information prepared by the PDC may be in error.

C: C3 (Doc# 100709458) dated 7-19-2016

Issue: This C3 appears to amend a prior handwritten C3 received by the PDC on June 16. The accompanying notes make it unclear whether the entire amount or a portion of the contribution was refunded. Again, the absence of the Schedule C for the corresponding period further adds to the concerns over erroneous reporting of contributions.

As a singular event, any of the issues discussed above could easily be attributed to simple human error and a minor oversight. In the collective, however, there is the appearance of a much deeper problem. I therefore urge the PDC to examine the above referenced filings, taking into consideration the erroneous figures reported, the material changes in the dates and amounts of contributions, loans and expenses as well as the previous warning issued by the PDC and take appropriate administrative actions as prescribed by law.