

# File a Formal Complaint - Jessica LaVigne

[Jessica LaVigne](#) reported 6 days ago (Tue, 25 Oct at 10:33 AM) via Portal [Meta](#)

October 23, 2016

Mr. Phil Stutzman  
Public Disclosure Commission  
711 Capitol Way #206  
PO Box 40908  
Olympia, WA 98504

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding improper disclosure filings by the Reagan Fund.

The King County Republican Committee (exempt) has reported receiving two \$10,000 contributions from the Reagan Fund, the first on July 20th, 2016 and the second on August 12th, 2016. I have attached C3 reports for each contribution that was filed by the King County Republican Committee (exempt).

The Reagan Fund has failed to report the second contribution to the King County Republican Committee (exempt) made on August 12th, 2016. I have attached The Reagan Fund's C4 report for the period covering July 26th through August 31st, where no record of this contribution can be found.

RCW 42.17A.225 requires committees to file timely, accurate reports of contributions and expenditures, including in-kind contributions. Based on this law, the Reagan Fund, has not properly reported this contribution and is not in compliance with state law.

Improperly filing accurate reports of contributions and expenditures has become a pattern with the House Republican Caucus. This is the 10th inaccurately reported contribution in the records of the Reagan Fund and HROC. Please see the complaint filed by Mina Mercer on October 21st for reference. This blatant disregard for state law is illegal and should be highly concerning to the Public Disclosure Commission whose mission it is provide the public with timely and accurate information regarding financing of political campaigns in the State of Washington.

The Reagan Fund's inability to file accurate reports not only violates state law, it also denies the public their right to have access to timely and accurate information regarding political spending in their state and their community.

I respectfully request the Public Disclosure Commission conduct a formal investigation and if wrongdoing is discovered impose appropriate penalties as determined by law.

Sincerely,

**Jessica LaVigne**  
Finance Director  
House Democratic Campaign Committee  
O: 206-381-1220 | C: 503-201-8210 | F: 206-381-1235  
Email: [jessica@hdcc.org](mailto:jessica@hdcc.org) | Web: [www.hdcc.org](http://www.hdcc.org)  
Mail: 4130 1st Avenue South, Suite D, Seattle, WA 98134

## 3 Attachments

PDF

[Reagan C4 9....](#)  
( 160 KB )

PDF

[King Co Repu...](#)  
( 44 KB )

PDF

[King Co Repu...](#)  
( 44 KB )

# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

**C4**  
(3/97)

PDC OFFICE USE  
100720936  
09-12-2016

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

Mailing Address  
 PO Box 904

City  
 Olympia, WA

|                                   |   |                           |   |
|-----------------------------------|---|---------------------------|---|
| Zip + 4<br>98507                  | Office Sought (Candidates)                        | Election Date<br>2016     | *For PACs, Parties & Caucus Committees: During this report period, did the committee make an <b>independent expenditure</b> (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)? |
| Report Period Covered<br>07/26/16 | From (last C-4)<br>To (end of period)<br>08/31/16 | Final Report?<br>Yes No X |   |

**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) ..... | \$             |            | 396,658.36 |
| 2. Cash received (From line 2, Schedule A) .....   | \$             | 348,550.00 |            |
| 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).....  |                |            | 348,550.00 |
| 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) .....   |                |            | 745,208.36 |
| 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) ..... |           | 381,676.44 |
| 11. Total cash expenditures (From line 4, Schedule A) .....   | 16,162.79 |            |
| 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).....  | 16,162.79 |            |
| 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).....  |           | 397,839.23 |

**CANDIDATES ONLY**

|                  | Won                      | Lost                     | Unopposed                | Name not on ballot       |
|------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Primary election | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General election | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**CASH SUMMARY**

|  |            |
|--|------------|
| 18. Cash on hand (Line 8 minus line 17).....<br><small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small> | 347,369.13 |
| 19. Liabilities: (Sum of loans and debts owed) .....   | 0.00       |
| 20. Balance (Surplus or deficit) (Line 18 minus line 19) .....   | 347,369.13 |

Treasurer's Daytime Telephone No.:

**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     |
|                       |      | Samantha Cotton       | 09/13/16 |

# CASH RECEIPTS AND EXPENDITURE

**SCHEDULE**  
to C4 **A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.) \_\_\_\_\_ Report Date  
07/26/16      08/31/16

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 |
|-----------------|------------|-----------------|--------|-----------------|--------|----------------|
| 08/05/2016      | 218,550.00 |                 |        |                 |        |                |
| 08/26/2016      | 130,000.00 |                 |        |                 |        |                |

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 348,550.00

**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<br>DEFINITIONS<br>ON NEXT PAGE | C - Contributions (monetary, in-kind & transfers)<br>I - Independent Expenditures<br>L - Literature, Brochures, Printing<br>B - Broadcast Advertising (Radio, TV)<br>N - Newspaper and Periodical Advertising<br>O - Other Advertising (yard signs, buttons, etc.)<br>V - Voter Signature Gathering | P - Postage, Mailing Permits<br>S - Surveys and Polls<br>F - Fundraising Event Expenses<br>T - Travel, Accommodations, Meals<br>M - Management/Consulting Services<br>W - Wages, Salaries, Benefits<br>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<br>(Name and Address)                  | Code | Purpose of Expense<br>and/or Description | Amount |
|-----------|--|------|--|--------|
| N/A       | Expenses of \$50 or less                                   | N/A  | N/A                                      | 436.41 |
| 08/15/16  | Hotel Murano<br>1320 Broadway<br>Tacoma, WA 98402-3411     | G    | Hotel for Tacoma meetings                | 293.28 |
| 08/15/16  | The Matador<br>721 Pacific Avenue<br>Tacoma, WA 98402-5207 | G    | Meeting meal                             | 120.00 |
| 08/01/16  | Facebook Ads<br>,  | O    | Facebook ads                             | 187.11 |
| 07/27/16  | Facebook Ads<br>,  | O    | Facebook ads                             | 751.42 |
| 07/29/16  | Facebook Ads<br>,  | O    | Facebook ads                             | 750.48 |
| 08/31/16  | Facebook Ads<br>,  | O    | Facebook ads                             | 474.97 |

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 13,149.12  
Enter also on line 11 of C4 \$ 16,162.79

# EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

07/26/16

08/31/16

| Date Paid | Vendor or Recipient<br>(Name and Address)                                 | Code | Purpose of Expense<br>and/or Description | Amount    |
|-----------|---|------|--|-----------|
| 08/18/16  | Facebook Ads<br>,   | O    | Facebook ads                             | 750.37    |
| 08/26/16  | Facebook Ads<br>,   | O    | Facebook ads                             | 751.92    |
| 08/02/16  | Facebook Ads<br>,   | O    | Facebook ads                             | 750.70    |
| 08/15/16  | Texaco<br>1400 NW Louisiana Avenue<br>Chehalis, WA 98532-1730             | G    | Gas                                      | 79.05     |
| 08/17/16  | Verizon Wireless<br>PO Box 9622<br>Mission Hills, CA 91346-9622           | G    | Cell phones                              | 511.77    |
| 08/01/16  | Century Link<br>PO Box 4300<br>Carol Stream, IL 60197-4300                | G    | Internet                                 | 132.87    |
| 07/27/16  | Community Progress PAC<br>218 Main St PMB 412<br>Kirkland, WA 98033-6108  |      | Contribution                             | 10,000.00 |
| 08/24/16  | Newslibrary.com<br>,  | G    | News subscription                        | 79.95     |
| 08/19/16  | Constant Contact<br>1601 Trapelo Road Suite 329<br>Waltham, MA 02451-7357 | G    | Email Service                            | 92.49     |
|           |   |      |  |           |
|           |   |      |  |           |
|           |   |      |  |           |

Page Total \$ 13,149.12

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100710409

07-25-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 King County Republican Central Committee Exempt

Mailing Address  
 845 106th Ave NE Ste. 110

City Bellevue, WA Zip + 4 98004 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date Received  | Amount | Total |
|--|--------|-------|
| a. Anonymous .....   |        |       |
| b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....         |        |       |
| c. Loans, notes, security agreements. Attach Schedule L .....                                    |        |       |
| d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....         |        |       |
| e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons) |        |       |

2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount    | Aggregate*<br>Total              |
|---------------|--|--|-------------|-------------|-----------|----------------------------------|
| 07/20/16      | THE REAGAN FUND<br>PO BOX 904<br>OLYMPIA, WA 98507                   |  |             |             | 10,000.00 | 10,000.00                        |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               | <input type="checkbox"/> Check here if additional pages are attached | <b>Sub-total</b>   |             |             | 10,000.00 | <b>*See reverse for details.</b> |
|               |  | <b>Amount from attached pages</b>                                    |             |             | 0.00      |                                  |

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

10,000.00

4. Date of Deposit: 07/20/16

Treasurer's Daytime Telephone No.: (425) 990-0404

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

Treasurer's Signature: Arthur Whitten Date: 07-25-2016

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100715749

08-15-2016

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 King County Republican Central Committee Exempt

Mailing Address  
 845 106th Ave NE Ste. 110

City Bellevue, WA Zip + 4 98004 Office Sought (candidates) Election Date 2016

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date Received |  | Amount | Total |
|---------------|--|--------|-------|
|               | a. Anonymous .....   |        |       |
|               | b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....         |        |       |
|               | c. Loans, notes, security agreements. Attach Schedule L .....                                    |        |       |
|               | d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....         |        |       |
|               | e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons) |        |       |

2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                        | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I | G<br>E<br>N | Amount    | Aggregate*<br>Total              |
|---------------|--|--|-------------|-------------|-----------|----------------------------------|
| 08/12/16      | THE REAGAN FUND<br>PO BOX 904<br>OLYMPIA, WA 98507                   |  |             |             | 10,000.00 | 20,000.00                        |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               |  | Occupation   |             |             |           |                                  |
|               | <input type="checkbox"/> Check here if additional pages are attached | <b>Sub-total</b>   |             |             | 10,000.00 | <b>*See reverse for details.</b> |
|               |  | <b>Amount from attached pages</b>                                    |             |             | 0.00      |                                  |

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

10,000.00

4. Date of Deposit: 08/12/16

Treasurer's Daytime Telephone No.: (425) 990-0404

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

Treasurer's Signature: Arthur Whitten Date: 08-15-2016