

(Complaint filed with PDC 12/15/2016):

To Whom it May Concern --

It has come to my attention that Jim Cooper has violated additional provisions of RCW 42.17A and even more violations than originally documented in the many previous complaints filed against his campaign to become Thurston County Commissioner.

1) Accepting over-limit contributions from JZ Knight, JZ Knight Inc, and Blu Room Enterprises, LLC. (Violation of RCW 42.17A.405, also see WAC 390-16-307)

As defined in WAC 390-16-307, JZ Knight, JZ Knight Inc, and Blu Room Enterprises, LLC are all a single entity and therefore, are subject to a single contribution limit.

Cooper accepted a \$1000 general election contribution from JZ Knight, a \$1000 general election contribution from JZ Knight Inc, and a \$1000 general election contribution from Blu Room Enterprises, LLC.

In total, these JZ Knight controlled entity contributed \$3000 to Jim Cooper for the general election, well in excess of the statutory limit of \$1000 that Cooper was legally eligible to accept.

Attached, please see documents from the Secretary of State's office showing proof that JZ Knight controls JZK Inc. and Blu Room Enterprises, LLC.

2) Illegal Personal Use of Campaign Funds for "Travel" (Violation of RCW 42.17A.445, see WAC 390-16-238)

On 9/7/2016, the Cooper campaign made an expenditure of \$100 to Tom Best for the purposes of "travel stipend."

On 9/19/2016, the Cooper campaign made an expenditure of \$100 to Tom Best for the purposes of "travel stipend."

On 9/30/2016, the Cooper campaign made an expenditure of \$160 to Tom Best for the purposes of "travel stipend."

On 11/21/2016, the Cooper campaign made an expenditure of \$500 to Thomasina Cooper (Jim's wife) for the purposes of "travel stipend".

These are textbook example of campaign money being illegally used for personal use. The PDC requires that all campaigns keep documented logs of gasoline used by a vehicle in relation to campaign purposes, per WAC 390-16-238 (3)(a).

Thomasina Cooper and Tom best failed to take meticulous notes in a travel log: accurately detail the miles traveled on each trip and describe how the trips related to the campaign. Their claimed legal reimbursement amounts are questionable at best and entirely illegal at worst. Either way these expenditures beg for closer PDC scrutiny and confirmation of the required documentation.

In the case of the expenditure to Thomasina Cooper, it is an unfortunate attempt by Cooper to direct the remaining campaign money in his account to himself and his family, in violation of state law.

3) Failure to accurately report debt to Thomasina Cooper & Percival Consulting Group (Violation of RCW 42.17A.240 (8))

a) The above-mentioned expenditure to Thomasina Cooper of \$500 for "travel stipend", if legitimate, was not reported as debt by the Cooper campaign on its 11/1/16 C4 , as required by law.

In the event that this mileage was entirely owed to Thomasina for travel after 11/1, then there would be no need to report the debt. This scenario is highly unlikely.

b) On 11/07/2016, Cooper's campaign made an expenditure to Percival Consulting for \$1300 for "consulting services".

This money was (for the most part) owed to Percival Consulting prior to 11/07/16 , so an estimate should have been reported as debt on the 11/1/16 C4, in accordance with RCW 42.17A.240 (8).

4) Failure to accurately describe expenditures. (Violation of RCW 42.17A.235)

During his campaign for Thurston County Commissioner, Jim Cooper made the following media buys without accurately describing them:

KRXY RADIO	7/18/2016	\$1,025.00	OLYMPIA	WA	98506	RADIO - 60 SEC. SPOTS
MIXX 96 FM	7/20/2016	\$990.00	OLYMPIA	WA	98501	RADIO SPOTS
KRXY RADIO	10/18/2016	\$1,075.00	OLYMPIA	WA	98506	KRXY RADIO AD
KRXY RADIO	10/18/2016	\$924.00	OLYMPIA	WA	98506	KRXY RADIO AD
KRXY RADIO	10/26/2016	\$1,300.00	OLYMPIA	WA	98506	KRXY RADIO AD
KRXY RADIO	10/27/2016	\$1,188.00	OLYMPIA	WA	98506	KRXY RADIO AD

KRXY RADIO	11/4/2016	\$400.00	OLYMPIA	WA	98506	RADIO ADS
MIXX 96 FM	11/4/2016	\$320.00	OLYMPIA	WA	98501	RADIO ADS

The PDC requires that "Expenditures for media buys must be broken down by date, amount paid, run dates of the ad, and each media outlet (newspaper, radio or TV station, billboard company, etc.).

Unfortunately, Cooper failed to include this required information on his C4s, and therefore failed to comply with the law.

5) Failure to accurately break down expenditures. (Violation of RCW 42.17A.235 & WAC 390-16-205)

WAC 390-16-205 specifically states 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 9 separate instances, Jim Cooper failed to properly break down these expenses as required by statute:

Re	MAILBOX	10/1	\$9,6	OLY	W	98	ADDRESS, TAB, SETUP AND DELIVERY, AND BULK POSTAGE FOR 30,014 PIECES OF MAIL
po	OF	3/20	76.3	MPI	A	50	
rt	OLYMPIA	16	7	A		1	
Re	MAILBOX	7/11/	\$5,8	OLY	W	98	SET-UP AND DELIVERY; BULK POSTAGE
po	OF	2016	03.9	MPI	A	50	
rt	OLYMPIA		5	A		1	
Re	MAILBOX	10/3	\$4,7	OLY	W	98	MAILING
po	OF	1/20	86.1	MPI	A	50	
rt	OLYMPIA	16	7	A		1	

Rep	COOPER	11/22/20	\$668.	OLYM	W	985	PRINTER/PAPER/SUPPLIES/OFFICE SETUP
ort	JIM	15	98	PIA	A	01	

Report	NOVELLI CHRIS	11/8/20 16	\$200. 00	LACEY	W A	9851 3	OFFICE SUPPLIES
Report	COOPER JIM	12/2/20 15	\$198. 39	OLYMP IA	W A	9850 1	PAPER. ENVELOPES, LABELS, ETC
Report	COOPER JIM	10/17/2 016	\$70. 92	OLYM PIA	W A	985 01	REIMBURSEMENT FOR VOLUNTEER BREAKFAST
Report	COOPER JIM	9/16/ 2016	\$6 0.0 0	OLY MPI A	W A	98 50 1	REIMBURSE VOLUNTEERS: ADMINSSION FEE CHAMBER CANDADATE FORUM
Report	COOPER JIM	4/30/2016	\$45.72	OLYMPIA	WA	98501	OFFICE SUPPLIES

6) Illegal Personal Use of Campaign Funds for "a snack" (Violation of RCW 42.17A.445, see WAC 390-16-238)

On 9/24/2016, the Cooper campaign made an expenditure for "snacks" (worth \$1.67) that were allegedly for Cooper's event "we saved the LBA Woods".

Because of the small price, it is highly likely that this expenditure was not for "snacks", but for a singular snack that was ingested by Jim Cooper personally, in a manner unrelated to his campaign.

This expenditure was likely for a \$1.50 small bag of chips, the price of which was increased to \$1.67 after city (Tumwater), county (Thurston), and state (Washington) sales taxes were applied.

WAC 390-16-238 (2) reads: an expenditure of a candidate's campaign funds shall be considered personal use if it fulfills or pays for any commitment, obligation or expense that would exist irrespective of the candidate's election campaign.

Because Cooper generally purchases snacks when he is hungry, and due to the fact that this snack is not realistically related to his campaign, this is an illegal use of campaign money for personal use. There is no proven campaign nexus for this expenditure.

I urge the PDC to investigate these claims immediately.

Best regards,

Glen Morgan