

o Whom It May Concern –

It has come to my attention that the San Juan County Democratic Party has violated provisions of **RCW 42.17A**.

1) Failure to timely 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 San Juan County Democratic Party failed on numerous occasions to do this.

a) According to the PDC, the following expenditures should have been reported on 3/10/2016:

2/5/2016	\$156.25	Islanders Bank	Debit for Set-up of Credit Card Processing Account
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Unfortunately, this expenditure was not reported until 7/24/2016, **roughly 136 days late**.

b) According to the PDC, the following expenditures should have been reported on 4/11/2016:

3/7/2016	\$294.00	US Postal Service	Stamps for Fundraising Letters
3/22/2016	\$50.95	Dustrude Louise	Stamps and Envelopes for Fundraising Letters
3/25/2016	\$500.00	Printonyx	Deposit to Printing Account

Unfortunately, these expenditures was not reported until 7/24/2016, **roughly 104 days late**.

c) According to the PDC, the following expenditures should have been reported on 5/11/2016:

4/3/2016	\$148.33	Turnoy David	Copying of Orcas Island Caucus Documentation
4/6/2016	\$60.00	San Juan Island Grange	Rent for 4/9/16 Quarterly Meeting
4/6/2016	\$54.73	Islanders Bank	Credit Card Processing Fees
4/15/2016	\$60.00	San Juan Island Grange	Rental for 5/16 County Convention

Unfortunately, these expenditures was not reported until 7/24/2016, **roughly 74 days late**.

d) According to the PDC, the following expenditures should have been reported on 6/10/2016:

5/24/2016	\$57.10	Martin Dale Diane	Ferry Fare to CD2 Caucuses 5/21/2016
5/25/2016	\$2,000.00	Roger and Jean Own Uni-Trust	Rent for Friday Harbor Campaign Space 6/15-7/14/2016
5/25/2016	\$120.00	Dustrude Tim	Webhosting

Unfortunately, these expenditures were not reported until 7/24/2016, **roughly 44 days late**.

e) According to the PDC, the following expenditure should have been reported on 10/18/2016:

9/7/2016	\$121.23	Martindale Diane	Food, Printing, Replacement Hillary Clinton Cutout
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Unfortunately, this expenditure was not reported until 10/23/2016, roughly **5 days late**.

f) According to the PDC, the following expenditures should have been reported on 1/10/2016:

12/2/2016	\$82.00	US Postal Service	PO Box 1007 Rent
12/10/2016	\$139.25	Sound Publishing	Notice of Post-Election Meeting 11.10 in Friday Harbor

Unfortunately, these expenditures were not reported until 1/15/2017, roughly **5 days late**.

g) According to the PDC, the following expenditures should have been reported on 7/12/2016:

7/6/2016	\$352.95	Dehlendorf David	Buttons, Signs for sale at HQ
6/23/2016	\$3,000.00	Roger and Jean Owen Uni-Trust	Rent July 16-Aug15 (\$2,000), Security Deposit (\$1,000)
6/22/2016	\$500.00	Printonyx	On Account for Future Printing
6/21/2016	\$193.47	Printonyx	Printing
6/17/2016	\$583.73	The Sign Company	Sign for Democracy Place HQ on Argyle Street
6/17/2016	\$60.00	The Computer Place	Internet Service Friday Harbor Office 7.2 to 7.31.16
6/14/2016	\$157.46	Tony's Terrific Carpet Care	Cleaning Carpet in Office in Friday Harbor
6/7/2016	\$201.32	Martindale Diane	Paint & Supplies for Refurbishing Friday Harbor SJCDP Office
6/7/2016	\$80.49	Allison Gretchen	Cardboard Cutouts for July 4th Parade

Unfortunately, these expenditures were not reported until 7/24/2016, roughly **12 days late**.

h) According to the PDC, the following expenditures should have been reported on 7/26/2016:

7/23/2016	\$386.15	Martin Dale Diane	Clinton and Clinton/Kaine Yard Signs
7/23/2016	\$65.73	Martin Dale Diane	Ink and Paper for Headquarters
7/21/2016	\$2,000.00	Roger and Jean Own Uni-Trust	Rent for 335 Argyle August 15 - Sept 15
7/20/2016	\$335.00	San Juan County Fairgrounds	Fees for Booth and Visitor Passes for San Juan County Fair
7/18/2016	\$60.00	The Computer Place	Internet Service at Friday Harbor Office
7/13/2016	\$1,148.63	Islanders Insurance	Liability Insurance for HQ

7/12/2016	\$357.86	Martin Dale Diane	Tacoma Convention Expense
7/12/2016	\$335.99	Umbach Learner	Tacoma Convention Expense
7/12/2016	\$307.35	Moss Randolhm	Materials to refurbish headquarters on Argyle
7/12/2016	\$256.02	O'Connell Robert	Tacoma Convention Expense
7/12/2016	\$231.86	Davidson Marjoe	Tacoma Convention Expense
7/12/2016	\$159.27	Toch Susan	Tacoma Convention Expense
7/12/2016	\$61.00	Abre U Sharon	Tacoma Convention Expense

Unfortunately, these expenditures were not reported until 7/30/2016, roughly **4 days late**.

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 San Juan County Democratic Party failed to illegally report the following debts on preceding C4s (see "**San Juan Democrats Illegal secret debt**" attachment.)

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 San Juan County Democratic Party illegally failed to break down the following expenses. (See file titled "**San Juan Democrats Illegal hidden expenditure list**" attached.)

4) Failure to report expenditure/in-kind contribution for mailing list. (Violation of RCW 42.17A.235)

The San Juan County Democratic Party sent out multiple mailers to registered voters within San Juan County.

The San Juan County Democratic Party used mailing lists to target specific voters in an effort to win the maximum number of voters per dollar spent.

Mailing lists have real market value, and many committees pay hundreds of dollars for mailing lists from vendors such as L2.

Unfortunately, because the San Juan County Democratic Party failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, it is in violation of **RCW 42.17A.235**. The San Juan County Democratic Party must amend its campaign finance reports to include the source of his mailing lists, either as an in-kind contribution to his campaign or as an expenditure.

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

The San Juan County Democratic Party failed to list the following officers, which is required by **RCW 42.17A.205(2)(c)**. The following officers were elected on or about December 12th, 2016(during the “re-org” meeting) with terms that began immediately:

Chair	David Turnoy	
Vice Chair (San Juan)		Walt Cooter
Vice Chair (Orcas)		Cindy Wolf
Vice Chair (Lopez)		Bob O’Connell
Secretary		Art Van Gelder
Treasurer		Eric Vittinghoff
State Committeeman		Learner Limbach
State Committeewoman		Natasha Frey

Unfortunately, the San Juan County Democratic Party failed to include most of the officers (with the sole exception of Chair Turnoy) on their amended C1PC. They were required to list these officers on their C1PC form within 10 days of their taking office.

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."

6) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 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..."


In their roles on the San Juan County Democratic Party's board, these individuals doubtlessly made illegal expenditures for the committee, in violation of state law.

The PDC should investigate the possibility that The San Juan 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

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Vendor	Date	Amount	Description	Description of Violation
LANGFORD MAC	2016-02-27	202.04	SOLD AT LOPEZ PRECINCT CAUCUSES ON 3/26/16	Failure to include an accurate description of the expenditure.
US POSTAL SERVICE	2016-10-13	1970.06	MAILING FINAL ELECTION RECOMMENDATIONS	Failure to include date the mailer was sent.
PRINTONYX	2016-10-13	1108.2	FINAL ELECTION MAILER	Failure to include date the mailer was sent.
SOUND PUBLISHING	2016-11-01	2994.03	PRE-ELECTION ADS IN LOCAL PAPERS	Failure to include run date of the ad, as well as the actual name of the newspapers the ad appeared in.

DEHLENDORF DAVID	2016-09-24	1249.88	CAMPAIGN MATERIALS	Failure to include the actual name of the vendor that printed the campaign materials.
MARTINDALE DIANE	2016-07-23	386.15	CLINTON AND CLINTON/KAINE YARD SIGNS	Failure to include the actual name of the vendor that printed the campaign materials.
DEHLENDORF DAVID	2016-07-06	352.95	BUTTONS SIGNS FOR SALE AT HQ	Failure to include the actual name of the vendor that printed the campaign materials.

SKAGIT COUNTY DEMOCRATS	2016-08-07	262	CLINTON YARD SIGNS	Failure to include the actual name of the vendor that printed the campaign materials.
MARTINDALE DIANE	2016-07-12	357.86	TACOMA CONVENTION EXPENSES	Failure to include the actual name of those that received the money, and what services were provided.
LIMBACH LEARNER	2016-07-12	335.99	TACOMA CONVENTION EXPENSES	Failure to include the actual name of those that received the money, and what services were provided.

MOSS RANDOLH M	2016-07-12	307.35	MATERIALS TO REFURBISH HEADQUARTERS ON ARGYLE	Failure to include the actual name of those that received the money, and what services were provided.
O'CONNELL ROBERT	2016-07-12	256.02	TACOMA CONVENTION EXPENSES	Failure to include the actual name of those that received the money, and what services were provided.

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DAVIDSON MARJOE	2016-07-12	231.86	TACOMA CONVENTION EXPENSES	
				Failure to include the actual name of those that received the money, and what services were provided.
TOCH SUSAN	2016-07-12	159.27	TACOMA CONVENTION EXPENSES	
				Failure to include the name of the actual entity that received the payment.
MARTINDALE DIANE	2016-06-07	201.32	PAINT & SUPPLIES FOR REFURBISHING FRIDAY HARBOR SJCDP OFFICE	

TURNOY DAVID	2016-04-03	148.33	COPYING OF ORCAS ISLAND CAUCUS DOCUMENTATION	Failure to include the name of the actual entity that received the payment.
MARTINDALE DIANE	2016-09-29	127.28	SUPPLIES FOR PHONE BANKING AT HQ	Failure to include the name of the actual entity that received the payment.
MARTINDALE DIANE	2016-09-07	121.23	FOOD PRINTING REPLACEMENT HILLARY CLINTON CUTOUT	Failure to include the name of the actual entity that received the payment.

DUSTRUDE TIM	2016-05-25	120	WEBHOSTING	Failure to include the name of the actual entity that received the payment.
ALLISON GRETCHEN	2016-06-07	80.49	CARDBOARD CUTOUTS FOR JULY 4TH PARAGE	Failure to include the name of the actual entity that received the payment.
MARTINDALE DIANE	2016-11-02	69.15	SUPPLIES FOR GOTV	Failure to include the name of the actual entity that received the payment.

MARTINDALE DIANE	2016-07-23	65.73	INK AND PAPER FOR HEADQUARTERS	Failure to include the name of the actual entity that received the payment.
ABREU SHARON	2016-07-12	61	TACOMA CONVENTION EXPENSES	Failure to include the name of the actual entity that received the payment.
MARTINDALE DIANE	2016-05-24	57.1	FERRY FARE TO CD2 CAUCUSES 5/21/2016	Failure to include the name of the actual entity that received the payment.

DUSTRUDE LOUISE	2016-03-22	50.95	STAMPS AND ENVELOPES FOR FUNDRAISING LETTERS	Failure to include the name of the actual entity that received the payment.
DEHLENDORF DAVID	2016-09-24	270.47	FORKLIFT RENTAL TO INSTALL SIGN AT 333 ARGYLE	Failure to include the name of the company that leased the forklift.

Vendor	Date	Amount	Description	Failure to report debt
ROGER AND JEAN OWEN UNITH TRUST	2016-06-23	3000	RENT JULY 16-AUG15 (\$2000) SECURITY DEPOSIT (\$1000)	This should have been reported as debt for the month in which the lease had been signed.
SOUND PUBLISHING	2016-11-01	2994.03	PRE-ELECTION ADS IN LOCAL PAPERS	This should have been reported as debt on the C4 covering the month of October.
ROGER AND JEAN OWEN UNITH TRUST	2016-09-22	2000	HQ RENT OCTOBER 15-NOVEMBER 15	This should have been reported as debt for the month in which the lease had been signed.

ROGER AND JEAN OWEN UNITH TRUST	2016-08-22	2000	15 HQ RENT SEPTEMBER TO OCTOBER	This should have been reported as debt for the month in which the lease had been signed.
ROGER AND JEAN OWEN UNITH TRUST	2016-07-21	2000	15 RENT FOR 335 ARGYLE AUGUST 15-SEPTEMBER 15	This should have been reported as debt for the month in which the lease had been signed.
ROGER AND JEAN OWEN UNITH TRUST	2016-05-25	2000	15 RENT FOR FRIDAY HARBOR CAMPAIGN SPACE 6/15 TO 7/14/2016	This should have been reported as debt for the month in which the lease had been signed.

US POSTAL SERVICE	2016-10-13	1970.06	MAILING FINAL ELECTION RECOMMENDATIONS	This should have been reported as debt on post-primary C4.
DEHLENDORF DAVID	2016-09-24	1249.88	CAMPAIGN MATERIALS	This should have been reported as debt on 7 day pre-primary C4.
ISLANDERS INSURANCE	2016-07-13	1148.63	LIABILITY INSURANCE FOR HQ	This should have been reported as debt on 21 day pre-primary C4.
PRINTONYX	2016-10-13	1108.2	FINAL ELECTION MAILER	This should have been reported as debt on post-primary C4.

THE SIGN COMPANY	2016-06-17	583.73	SIGN FOR DEMOCRACY PLACE HQ ON ARGYLE STREET	This should have been reported as debt on C4 covering the time period of May.
PRINTONYX	2016-07-27	500	ON ACCOUNT	This should have been reported as debt on 7 day pre-primary C4.
PRINTONYX	2016-06-22	500	ON ACCOUNT FOR FUTURE PRINTING	This should have been reported as debt on C4 covering the time period of May.
MARTINDALE DIANE	2016-07-23	386.15	CLINTON AND CLINTON/KAINE YARD SIGNS	This should have been reported as debt on 21 day pre-primary C4.

MARTINDALE DIANE	2016-07-12	357.86	TACOMA CONVENTION EXPENSES	This should have been reported as debt on C4 covering the time period of June.
DEHLENDORF DAVID	2016-07-06	352.95	BUTTONS SIGNS FOR SALE AT HQ	This should have been reported as debt on C4 covering the time period of June.
LIMBACH LEARNER	2016-07-12	335.99	TACOMA CONVENTION EXPENSES	This should have been reported as debt on C4 covering the time period of June.
SAN JUAN COUNTY FAIRGROUNDS	2016-07-20	335	FEES FOR BOOTH AND VISITOR PASSES FOR SAN JUAN COUNTY FAIR	This should have been reported as debt on 21 day pre-primary C4.

MOSS RANDOLH M	2016-07-12	307.35	MATERIALS TO REFURBISH HEADQUARTERS ON ARGYLE	This should have been reported as debt on C4 covering the time period of June.
CAKES BY FELICITATIONS	2016-11-10	300	CAKE	This should have been reported as debt on 7 day pre-general C4.
DEHLENDORF DAVID	2016-09-24	270.47	FORKLIFT RENTAL TO INSTALL SIGN AT 333 ARGYLE	This should have been reported as debt on post-primary C4.
HARBOR RENTAL AND SAW SHOP	2016-11-26	269.04	RENTAL OF LIFT TRUCK TO REMOVE SIGN AT DEMOCRACY PLACE	This should have been reported as debt on 7 day pre-general C4.

SKAGIT COUNTY DEMOCRATS	2016-08-07	262	CLINTON YARD SIGNS	This should have been reported as debt on 7 day pre-primary C4.
O'CONNELL ROBERT	2016-07-12	256.02	TACOMA CONVENTION EXPENSES	This should have been reported as debt on C4 covering the time period of June.