



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH
RCW 42.17A

Washington Teamsters Legislative
League

Respondent.

PDC Case 29798

Report of Investigation

I. BACKGROUND

- 1.1 Washington Teamsters Legislative League (WTLL) is a political committee formed and operated by Joint Council of Teamsters No. 28 (Joint Council 28), which supports Local Unions and their memberships in Washington, Alaska, and Northern Idaho. Rick Hicks is the President of Joint Council 28, and serves as Treasurer of WTLL.

II. ALLEGATIONS IN COMPLAINT

- 2.1 On December 21, 2017, a complaint was filed with the Public Disclosure Commission (PDC) by Glen Morgan alleging that during 2016 and 2017, WTLL, its officers, and its treasurer, may have committed multiple violations of RCW 42.17A. **(Exhibit 1)**
- 2.2 Mr. Morgan also filed the complaint as a Citizen Action Notice (CAN) under RCW 42.17A.765(4) on December 21, 2017, with the Attorney General's Office (AGO) and the King County Prosecuting Attorney's office. Mr. Morgan's complaint to the PDC alleged that during 2016 and 2017, Washington Teamsters Legislative League:
1. Failed on numerous occasions to file accurate, timely C-3 and C-4 reports of contributions and expenditures (RCW 42.17A.235 & .240). The complaint included Exhibit A, a spreadsheet listing allegedly late-filed C-3 and C-4 reports.
 2. Failed to accurately, and timely, report debt (RCW 42.17A.240(8)). The complaint included Exhibit B, a spreadsheet listing alleged debt that was not timely reported.
 3. Failed to properly break down and describe expenses (RCW 42.17A.235) (*See* WAC 390-16-037 and WAC 390-16-205). Although the complaint alleged that this violation applied to multiple expenditures, it did not cite specific examples in support

of the alleged violations. However, several of the expenditures included in Exhibit B to the complaint did not contain a complete description of the expenditure.

4. Failed to file various C-6 reports related to independent expenditures (RCW 42.17A.255, RCW 42.17A.260, or RCW 42.17A.305). The complaint did not provide evidence of these alleged violations. However, Exhibit B to the complaint included an expenditure with a description of "Independent Expenditure."
- 2.3 Mr. Morgan asked the PDC to investigate the possibility that WTLL committed these allegations maliciously, and if that is the case, to refer the case to the Attorney General's office for criminal prosecution.
 - 2.4 On January 16, 2018, PDC staff notified WTLL that on December 22, 2017, the PDC received a complaint filed by Glen Morgan, and that because the complaint was filed as a Citizen Action Notice under RCW 42.17A.765(4), the PDC would not be initiating a preliminary review of the complaint until the Attorney General's Office had taken action or indicated to the PDC that they would not be taking action.
 - 2.5 On July 18, 2018, PDC staff notified Mr. Morgan of changes to the Public Disclosure Commission's enforcement procedures, pursuant to Engrossed Substitute House Bill 2938, a law that took effect June 7, 2018.
 - 2.6 On November 5, 2018, Mr. Morgan filed a "10-day letter" under the provisions of RCW 42.17A.775(2)(a) notifying the PDC that he intended to file a lawsuit against the respondent on behalf of the state as provided by law if a lawsuit was not filed by the state by November 15, 2018.
 - 2.7 On November 15, 2018, PDC staff informed Mr. Morgan that after conducting a preliminary review and assessment of his complaint filed December 21, 2017, staff had opened a formal investigation on November 13, 2018, and held an Initial Hearing (Case Status Review) on November 14, 2018, pursuant to RCW 42.17A.755 and WACs 390-37-060 and 390-37-071.

II. FINDINGS

- 3.1 On January 30, 2018, the PDC received a response to the complaint from Dmitri Iglitzin, sent on behalf of Washington Teamsters Legislative League. **(Exhibit 2)**

Alleged failure, on numerous occasions, to file accurate, timely C-3 and C-4 reports of contributions and expenditures (RCW 42.17A.235 & .240). (The complaint included Exhibit A, a spreadsheet listing allegedly late-filed C-3 and C-4 reports.)

- 3.2 In a letter to the Attorney General's Office, sent in response to Mr. Morgan's CAN, Mr. Iglitzin stated that WTLL has at all times endeavored to meet all of its filing requirements, and believes it has done so in all material respects. He said most receipts and expenditures were timely and accurately filed. He acknowledged that in some instances, WTLL made modest and appropriate amendments, which the complainant has interpreted to constitute late filings because the amended reports were filed after the due date for the original report. He

said in some cases, filing errors were the result of technical difficulties or due-date errors attributable to the PDC's ORCA filing system. Mr. Iglitzin described any viable allegations as *de minimis*, more appropriate for resolution by the PDC.

3.3 PDC staff's review of the alleged failure to file accurate, timely C-3 and C-4 reports of contributions and expenditures found:

C-4 Reporting

3.4 The complaint alleged four amended C-4 reports covering reporting periods in 2016 and 2017 were filed late. The C-4 amending January 2016 was filed 57 days late, the C-4 amending February 2016 was filed 28 days late, the C-4 amending November 2016 was filed 29 days late, and the C-4 amending October 17-30, 2017 was filed 22 days late. However, the original reports were all filed timely. Of these four amended reports, two were amended to include \$1,093 and \$222 for the in-kind value of wages and benefits for two employees loaned to WTLL by the Joint Council of Teamsters. One of the reports was amended to remove a \$250 campaign contribution included in error on the original report, and the fourth C-4 was amended to reduce a \$500 expenditure to the Washington Fair Trade Coalition from \$500 to \$400.

3.5 The complaint also alleged that the 21 day pre-primary C-4, covering the period 6/1/16 – 7/11/16, due 7/12/16, was filed 24 days late on 8/5/16. However, the C-4 filed 8/5/16 was not the 21 day pre-primary C-4 report. Rather, it was a C-4 report covering the month of July, filed 8/5/16. WTLL was involved in the primary and general elections, which required the committee to file 21 day, 7 day, and Post-election C-4 reports for both the primary and general elections. Instead, WTLL filed monthly C-4 reports through the month of August, and then filed reports for the special reporting periods of the general election.

3.6 The C-4 report covering 7/1/16 – 7/31/16 was filed 8/5/16, which would have been timely if a report had been due for July. However, as noted above, a report for July was not required. Rather, 21 day pre-primary and 7 day pre-primary C-4 reports were required. The summary listing of C-3 bank deposits and the monetary expenditures listed on Schedule A of the July C-4 report were examined to determine which transactions were required to be reported on the two pre-primary C-4 reports, and any lateness associated with the improper reporting. Following are the results of the examination:

- 21 day pre-primary C-4: One bank deposit totaling \$12,230.97 was listed on the July C-4, filed 8/5/16, 24 days after it was required to be reported on the 21 day pre-primary C-4, due 7/12/16.
- 21 day pre-primary C-4: Monetary expenditures totaling \$1,665.00 were reported on the July C-4, filed 8/5/16, 24 days after they were required to be reported on the 21 day pre-primary C-4, due 7/12/16.
- 7 day pre-primary C-4: One bank deposit totaling \$9,180.00 was listed on the July C-4, filed 8/5/16, 10 days after it was required to be reported on the 7 day pre-primary C-4, due 7/26/16.

- 7 day pre-primary C-4: Monetary expenditures totaling \$48,279.60 were reported on the July C-4, filed 8/5/16, 10 days after they were required to be reported on the 7 day pre-primary C-4, due 7/26/16.

3.7 WTLL timely reported the receipts and expenditures that should have been reported on the Post-primary C-4 (7/26-8/31, due 9/12/16) by reporting the receipts and expenditures on an August C-4, filed 9/9/16.

C-3 Reporting

3.8 Following is a list of nine original, late-filed, C-3 reports filed from 7-22 days late, totaling \$149,499. These late-filed reports represent deposits made in in June, July, August, and September 2016, and in August and October 2017. The contributions were from IBT DRIVE, an affiliated union in Washington D.C., and Joint Council of Teamsters 28 in Tukwila, Washington.

1. \$34,567, deposited 6/15/16, reported 18 days late on 7/8/16 (100705989)
2. \$12,231, deposited 7/11/16, reported 18 days late on 8/5/16 (100714360)
3. \$9,180, deposited 7/21/16, reported 11 days late on 8/5/16 (100714361)
4. \$35,708, deposited 8/24/16, reported 11 days late on 9/9/16 (100719519)
5. \$20,501, deposited 8/24/16, reported 11 days late on 9/9/16 (100719520)
6. \$10,001, deposited 9/29/16, reported 11 days late on 10/14/16 (100726175)
7. \$12,300, deposited 6/23/17, reported 22 days late on 7/18/17 (100776029)
8. \$9,511, deposited 8/21/17, reported 11 days late on 9/8/17 (100785812)
9. \$5,500, deposited 10/2/17, reported 7 days late on 10/16/17 (100792901)

3.9 The first five deposits listed above were re-filed as amended reports as follows:

1. \$34,567 – The amended C-3 appeared to be filed 116 days late on 10/14/16. However, as noted above, the original C-3 was filed 18 days late on 7/8/16.
2. \$12,231 – The amended C-3 appeared to be filed 88 days late on 10/14/16. However, as noted above, the original C-3 was filed 18 days late on 8/5/16.
3. \$9,180 – The amended C-3 appeared to be filed 81 days late on 10/14/16. However, as noted above, the original C-3 was filed 11 days late on 8/5/16.
4. \$35,708 – The amended C-3 appeared to be filed 46 days late on 10/14/16. However, as noted above, the original C-3 was filed 11 days late on 9/9/16.
5. \$20,501 – The amended C-3 appeared to be filed 46 days late on 10/14/16. However, as noted above, the original C-3 was filed 11 days late on 9/9/16.

3.10 Two other amended C-3 reports appeared to be filed 157 and 126 days late, as shown below. However, the original C-3 reports were filed timely. Following is a summary of these C-3 Report transactions:

- \$11,000 - Reported as filed, 157 days late on 10/14/16. However, the same contribution was timely reported on 5/9/16.
- \$8,400 - Reported as filed, 126 days late on 10/14/16. However, the same contribution was timely reported on 5/17/16.

Alleged failure to accurately and timely report debt (RCW 42.17A.240(8)). (The complaint included Exhibit B, a spreadsheet listing alleged debt that was not timely reported.)

3.11 Mr. Iglitzin said WTLL pays very few vendors, and when it does, promptly reports its payments. He said WTLL pays for goods and services upon delivery or production, for example, rent and accounting fees are paid in the current month of the bill. He said WTLL pays for goods and services on the date payment is requested, and has no past-due amounts to report as debt. Mr. Iglitzin said the amounts listed in Exhibit B as unreported debt are properly reported as monetary expenditures when payment is made. **(Exhibit 2)**

3.12 Exhibit B to the complaint included 45 entries for accounting services or office rent. Accounting fees are monthly payments against a retainer for accounting services, and rent is a monthly payment for office space.

3.13 On June 7, 2018, Engrossed Substitute House Bill (ESHB) 2938 became effective, clarifying that for the purposes of reporting expenditures under RCW 42.17A.240, debt does not include “regularly recurring expenditures of the same amount that have already been reported at least once and that are not late or outstanding.”

3.14 Exhibit B to the complaint lists multiple examples of monetary expenditures the complainant alleges should have been reported as “debts or obligations” on the report preceding the report showing the monetary expenditures. For example, if an expenditure was made on 4/3/17, the complaint assumes the goods or services were likely received during March 2017, and that the March C-4 report should have included “orders placed, debts, or obligations” for the estimated value of the goods or services. Expenditures from the complaint in this category are listed below, and again in Exhibit 3 to the Report of Investigation. Each of the expenditures listed below that are attributed to Cerillion N4 Partners represent three separate expenditures from Exhibit B to the complaint and Exhibit 3 to the Report of Investigation. **(Exhibit 3)**

- 7/25/16; \$1,029.60; Meals, snacks, hotels, ferry rides for candidate interviews; Credit card payment. Not clear when the actual expenses were incurred.
- 8/24/16; \$346.21; Travel for candidate interviews, etc. Credit card payment. Not clear when the actual expenses were incurred.
- 8/24/16; **\$5,447.81**; Design, editing, printing, mailing, postage; Payment to **Cerillion N4 Partners**.
- 10/20/16; \$277.99; Travel Expenses; Credit card payment; Not clear when actual expenses were incurred.

- 6/16/16; \$367.20; Reimbursements for travel expenses; Payment to Waypoint Consulting Group.
- 6/16/16; \$979.69; Travel and food for candidate interviews; Credit card payment; Not clear when actual expenses were incurred.
- 9/23/16; \$711.81; Travel expenses for candidate interviews; Credit card payment; Not clear when actual expenses were incurred.
- 9/23/16; \$978.69; Travel expenses; Paid Marcus Whitman.
- 1/12/17; \$1,442.14; Reimbursement for travel expenses; Paid Teamsters Local for Brad Taylor's travel to political meetings.
- 11/23/16; \$777.79; Food and Beverage for MLK Canvass and phone bank; Credit card payment; Not clear when actual expenses were incurred.
- 11/3/16; **\$31,642**; Design, editing, postage, printing and mailing; **Cerillion N4 Partners**.
- 1/13/16; \$905.18; Reimbursement for Brad Taylor's expenses; Paid to Teamsters Local.
- 12/21/16; \$465.06; Reimbursement for travel expenses; Credit card payment; Not clear when actual expenses were incurred.
- 12/14/16; \$17,896.33; Wages and benefits for member communication, September to November 2016; Paid Joint Council of Teamsters.
- 3/24/17; \$1,557.99; Name badges for WTLL events; Paid Abracadabra Printing;
- 3/1/17; \$286.79; Shirts for legislative liaisons; Paid Image Pointe; Not clear if shirts were ordered during prior month.
- 3/3/17; \$2,579.04; Travel and meals for lobbying; Paid credit card; Not clear when actual expenses were incurred.
- 3/24/17; \$253.27; Meals and travel; Paid credit card; Not clear when actual expenses were incurred.
- 4/20/17; \$2,706.18; Hotel, airfare, taxi, parking, and meals for month of April; Paid credit card; Not clear when actual expenses were incurred.
- 5/19/17; \$496.44; Travel expenses for meetings; Paid credit card; Not clear when actual expenses were incurred.
- 5/19/17; \$5,701; Hotel and meals for Teamster lobby day and women's lobby day; Paid Red Lion Hotel.

- 10/3/17; \$1,177.25; Travel expenses and snacks for candidate interviews; Paid credit card; Not clear when actual expenses were incurred.
- 11/9/17; **\$29,130**; Design, editing, printing, mail service, postage for member contact and communication; Paid to **Cerillion N4 Partners**.
- 11/16/17; \$1,318.98; Travel and snacks for meetings; Paid credit card; Not clear when actual expenses were incurred.
- 11/28/17; \$394.56; Phone banking for October and November 2017; Paid AT&T Mobility.
- 8/4/17; **\$5,990.68**; Design, editing, printing, mail services; Paid **Cerillion N4 Partners**.
- 7/31/17; \$265.06; Food and parking; Paid credit card.
- 8/29/17; \$1,011.91; Travel and meeting expenses; Paid credit card; Not clear when actual expenses were incurred.
- 10/27/17; \$988.89; Travel expenses; Paid credit card; Not clear when actual expenses were incurred.

3.15 As noted above, there were four time periods in 2016 and 2017 where WTLL paid Cerillion N4 Partners for work consisting of design, editing, printing, mail service, and postage. Staff investigated whether these payments should have also been reported in the prior reporting period as orders placed or debts.

3.16 Staff spoke with Carson Phillips-Spotts, an attorney with Worker Law (Barnard Iglitzin & Lavitt LLP) representing WTLL. Phillips-Spotts said he spoke with Cerillion, and acknowledged that orders were likely placed during the pre-primary and pre-general election periods, that should have been reported as orders placed or debts on those reports, in addition to being reported as monetary expenditures when the bills were paid.

3.17 As a factor in mitigation, Phillips-Spotts said the mailings in question were sent to union members, and could have been paid for using general treasury funds instead of PAC funds. He said WTLL intends to use general treasury funds for these expenditures in the future. He said the expenditures identified as post-primary expenses in August 2016 and August 2017 were small in comparison to the expenditures identified as post-general expenses in 2016 and 2017. He said the pre-primary expenses were to pay for annual notifications required by PDC law, sent to members who donate to WTLL's political committee through payroll deductions. Phillips-Spotts said the expenditures identified as post-general expenses were large mailings sent to members to identify preferred candidates in the upcoming elections.

Alleged failure to properly break down and describe expenses (RCW 42.17A.235) (See WAC 390-16-037 and WAC 390-16-205). Although the complaint did not provide specific examples in support of the alleged violations, several expenditures listed in Exhibit B to the complaint appeared to lack complete descriptions.

3.18 Mr. Iglitzin stated that although the complaint alleges WTLL failed to sufficiently break down and describe its expenditures, the complaint failed to cite a single example of the alleged violation. Mr. Iglitzin also noted the Attorney General and PDC have previously rejected similar allegations made by the complainant. Mr. Iglitzin cited an example in which the complainant alleged the reports of a candidate failed to list the quantity of copies purchased from a printer, even though the reports identified the purpose of the expenditures. Mr. Iglitzin noted the PDC found the flagged expenditures were “sufficiently identified and accounted for.” **(Exhibit 2)**

3.19 Staff identified expenditures paid to Cerillion N4 Partners during four time periods (post-primary and post-general, in 2016 and 2017) and asked whether the payments included payments to sub-vendors. The payments were: **(Exhibit 4)**

- 8/24/16, \$5,447.81, for design, editing, printing, mailing, postage;
- 11/3/16, \$31,642, for design, editing, postage, printing and mailing;
- 8/4/17, \$5,990.68, design, editing, printing, mail services;
- 11/9/17, \$29,130, design, editing, printing, mail service, postage for member contact and communication;

3.20 Phillips-Spotts discussed the matter with Cerillion N4 Partners and said sub-vendors were paid, without listing the sub-vendors by name and amount, because Cerillion does not have in-house printing capability, and must purchase postage for its mailings.

3.21 Staff identified several expenditures from Exhibit B to the complaint that were credit card payments or reimbursements for travel related expenses that failed to list the vendors where the original purchases were made. The expenditures are listed in Exhibit 4, and totaled \$19,078.38. **(Exhibit 4)**

Alleged failure to file various C-6 reports related to independent expenditures (RCW 42.17A.255, RCW 42.17A.260, or RCW 42.17A.305). (The complaint did not provide evidence of these alleged violations.)

3.22 Mr. Iglitzin stated that WTLL has never made any independent expenditures, and is not required to file C-6 reports for its expenditures. He said the items identified in the complaint as being independent expenditures included a description of “Independent Expenditure” because they were expenditures to committees who themselves make independent expenditures. For example, the \$10,000 expenditure on 10/12/17 to People for Jenny Durkan is an expenditure to a political committee making expenditures supporting Jenny Durkan.

III. SCOPE

4.1 PDC staff reviewed the complaint and the response provided by Dmitri Iglitzin, Counsel, on behalf of WTLL. Staff reviewed reports filed by the respondent with the Public Disclosure Commission. Staff also communicated with Carson Phillips-Spotts, Counsel for WTLL.

IV. LAW

RCW 42.17A.235 and **.240** require candidates, single election issue political committees, and continuing political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Contributions are reported weekly during this same time period, and must be disclosed on Monday for contributions deposited during the previous seven days.

WAC 390-16-037 obligates any person required to report the “purpose” of an expenditure under RCW 42.17A.240(6) or 42.17A.255(5)(b) to identify any candidate(s) or ballot proposition(s) supported or opposed by the expenditure, and to describe in detail the goods and/or services provided by the expenditure. The rule includes two examples for disclosing the details of the goods and/or services provided.

WAC 390-16-205 states expenditures by agents and agents’ subvendors, made on behalf of a candidate or political committee, shall be deemed expenditures by the candidate or committee. The rule states that in accordance with WAC 390-16-037, such expenditures shall be reported by the candidate or political committee as if made or incurred by the candidate or committee directly. The rule includes three examples for disclosing the details of the goods and/or services provided.

Respectfully submitted this 25th day of March, 2020.

Electronically Signed Philip E. Stutzman

Philip E. Stutzman
Compliance Officer

EXHIBIT LIST

- Exhibit 1** Complaint filed December 21, 2017
- Exhibit 2** Response to complaint received January 30, 2018 from Dmitri Iglitzin, counsel for Washington Teamsters Legislative League
- Exhibit 3** Chart showing alleged failure to report debt
- Exhibit 4** Chart showing alleged failure to properly describe expenditures

File a Formal Complaint - Glen Morgan

[Glenmorgan89](#) (Thu, 21 Dec, 2017 at 10:27 PM) via Portal Meta
To Whom it May Concern --

It has come to my attention that the Teamsters Legislative League, its officers, and its treasurer have habitually, egregiously, 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.

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, Teamsters Legislative League has failed on numerous occasions to do this. (See **Exhibits A - "Illegally late reported C3 and C4 reports"**)

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 be reported on form C4. 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.

Teamsters Legislative League illegally failed to report the following debts: (See **Exhibit B - "Illegal failure to timely report debts"**).

3) Failure to properly break down, describe expenses. (Violation of RCW 42.17A.235, see WAC 390-16-205, WAC 390-16-037)

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** and **WAC 390-16-205**, such expenditures shall be reported by the candidate or committee as if made or incurred by the candidate or committee directly. Additionally, in accordance with **WAC 390-16-037**, the exact purpose of the expenditure, the quantity of items printed, and the individual value of broadcast ads distributed on various media outlets must be disclosed on form C4. The sheer volume of violations of this statute are extensive and will require exhaustive review and correction of nearly every C4 filed by this organization.

Additionally, it appears that the Teamsters have failed to file various C6 reports related to their independent expenditures. This is a serious violation of state law. By itself this is a unique set of violations.

Teamsters Legislative League illegally failed to break down multiple expenditures. The PDC should investigate the possibility that Teamsters Legislative League 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.

Please note I have provided both sets of spreadsheets in Excel and PDF formats for staff convenience.

Best Regards,

Glen Morgan

Exhibit A -- Illegally Late filed C3 and C4 reports

Approximate Cumulative Days Late -- 2386							
Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
1	100688941	C4	Y		2/10/2016	4/7/2016	57
2	100688942	C4	Y		3/10/2016	4/7/2016	28
3	100714363	C4	N		7/12/2016	8/5/2016	24
4	100733440	C4	N		11/1/2016	11/2/2016	1
5	100733635	C4	Y		11/1/2016	11/3/2016	2
6	100740573	C4	Y		12/12/2016	1/10/2017	29
7	100749057	C4	N		2/10/2017	2/13/2017	3
8	100776034	C4	N		7/11/2017	7/18/2017	7
9	100801191	C4	Y		10/31/2017	11/22/2017	22
10	100705990	C3	N	6/30/2016	7/4/2016	7/8/2016	4
11	100705988	C3	N	6/15/2016	6/20/2016	7/8/2016	18
12	100705989	C3	N	6/15/2016	6/20/2016	7/8/2016	18
13	100714362	C3	N	7/11/2016	7/18/2016	8/5/2016	18
14	100714360	C3	N	7/11/2016	7/18/2016	8/5/2016	18
15	100714361	C3	N	7/21/2016	7/25/2016	8/5/2016	11
16	100719520	C3	N	8/24/2016	8/29/2016	9/9/2016	11
17	100719521	C3	N	8/1/2016	8/8/2016	9/9/2016	32
18	100719519	C3	N	8/24/2016	8/29/2016	9/9/2016	11
19	100726171	C3	Y	7/11/2016	7/18/2016	10/14/2016	88
20	100726165	C3	Y	5/17/2016	6/10/2016	10/14/2016	126
21	100726167	C3	Y	6/15/2016	6/20/2016	10/14/2016	116
22	100726164	C3	Y	5/1/2016	6/10/2016	10/14/2016	126
23	100726172	C3	Y	8/24/2016	8/29/2016	10/14/2016	46
24	100726169	C3	Y	7/11/2016	7/18/2016	10/14/2016	88
25	100726179	C3	N	9/1/2016	9/5/2016	10/14/2016	39
26	100726181	C3	N	5/17/2016	6/10/2016	10/14/2016	126
27	100726173	C3	Y	8/24/2016	8/29/2016	10/14/2016	46
28	100726162	C3	Y	4/14/2016	5/10/2016	10/14/2016	157
29	100726180	C3	N	4/14/2016	5/10/2016	10/14/2016	157
30	100726166	C3	Y	6/15/2016	6/20/2016	10/14/2016	116
31	100726161	C3	Y	4/1/2016	5/10/2016	10/14/2016	157
32	100726176	C3	N	9/1/2016	9/5/2016	10/14/2016	39
33	100726177	C3	Y	9/1/2016	9/5/2016	10/14/2016	39
34	100726175	C3	N	9/29/2016	10/3/2016	10/14/2016	11
35	100726170	C3	Y	7/21/2016	7/25/2016	10/14/2016	81
36	100726168	C3	Y	6/30/2016	7/4/2016	10/14/2016	102
37	100726174	C3	Y	8/1/2016	8/8/2016	10/14/2016	67
38	100726605	C3	N	9/30/2016	10/3/2016	10/17/2016	14
39	100726604	C3	N	9/30/2016	10/3/2016	10/17/2016	14
40	100737142	C3	N	11/1/2016	11/7/2016	12/9/2016	32
41	100737143	C3	N	11/1/2016	11/7/2016	12/9/2016	32
42	100749053	C3	N	1/31/2017	2/10/2017	2/13/2017	3
43	100749054	C3	N	1/31/2017	2/10/2017	2/13/2017	3
44	100776026	C3	N	6/20/2017	6/26/2017	7/18/2017	22
45	100776027	C3	N	6/20/2017	6/26/2017	7/18/2017	22
46	100776029	C3	N	6/23/2017	6/26/2017	7/18/2017	22
47	100776030	C3	N	6/30/2017	7/3/2017	7/18/2017	15
48	100776031	C3	N	6/30/2017	7/3/2017	7/18/2017	15
49	100776032	C3	N	7/6/2017	7/10/2017	7/18/2017	8
50	100778245	C3	N	7/21/2017	7/24/2017	7/25/2017	1
51	100785812	C3	N	8/21/2017	8/28/2017	9/8/2017	11
52	100785814	C3	N	7/31/2017	8/7/2017	9/8/2017	32
53	100785813	C3	N	8/21/2017	8/28/2017	9/8/2017	11
54	100785815	C3	N	8/31/2017	9/4/2017	9/8/2017	4

Violation #	Report #	Report Type	Amended? Y/N	Deposit Date	Due Date	Day Reported	Approximate Days Late
55	100792901	C3	N	10/2/2017	10/9/2017	10/16/2017	7
56	100792902	C3	N	10/5/2017	10/9/2017	10/16/2017	7
57	100792903	C3	N	9/30/2017	10/2/2017	10/16/2017	14
58	100792899	C3	N	9/1/2017	9/4/2017	10/16/2017	42
59	100792900	C3	N	9/30/2017	10/2/2017	10/16/2017	14

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516	As of --		12/21/2017	
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx . days late
1	HUEBNER, DOOLEY & MCGINNESS, P.S.	4/1/2016	\$360.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of March 2016.	619
2	JOINT COUNCIL OF TEAMSTERS NO. 28	4/1/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of March 2016.	619
3	HUEBNER, DOOLEY & MCGINNESS, P.S.	7/7/2016	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of May 2016.	559
4	JOINT COUNCIL OF TEAMSTERS NO. 28	7/7/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2016.	559
5	BANK OF AMERICA	7/25/2016	\$1,029.60	MEALS, SNACKS, HOTEL & FERRY RIDES FOR CANDDIATE INTERVIEWS	This should have been reported as debt on the 21 day pre-primary C4.	527
6	WASHINGTON FAIR TRADE COALITION	8/24/2016	\$500.00	ROCK AGAINST THE TPP CONCERT	This should have been reported as debt on the 7-day pre-primary C4.	513
7	HUEBNER, DOOLEY & MCGINNESS, P.S.	8/1/2016	\$365.00	ACCOUNTING RETAINER	This should have been reported as debt on the 7-day pre-primary C4.	513
8	BANK OF AMERICA	8/24/2016	\$346.21	TRAVEL FOR CANDIDATE INTERVIEWS AND MEETING WITH HOUSE REPS WITH LOCAL 589 AND LOCAL 117	This should have been reported as debt on the 7-day pre-primary C4.	513
9	JOINT COUNCIL OF TEAMSTERS NO. 28	8/1/2016	\$800.00	RENT	This should have been reported as debt on the 7-day pre-primary C4.	513
10	CERILLION N4 PARTNERS	8/24/2016	\$895.49	POSTAGE	This should have been reported as debt on the 7-day pre-primary C4.	513
11	CERILLION N4 PARTNERS	8/24/2016	\$2,252.32	PRINTING AND MAILING OF DRIVE NOTIFCATION	This should have been reported as debt on the 7-day pre-primary C4.	513
12	CERILLION N4 PARTNERS	8/24/2016	\$2,300.00	DESIGN, EDITING AND CERILLION PARTNERS	This should have been reported as debt on the 7-day pre-primary C4.	513
13	SCHERWIN CAMPBELL BARNARD & IGLITZIN	10/19/2016	\$938.50	LEGAL ADVISE EXPENSES	This should have been reported as debt on the 21 day pre-general C4.	429
14	BANK OF AMERICA	10/20/2016	\$277.99	TRAVEL EXPENSES FOR LILY WILSON-CODEGA	This should have been reported as debt on the 21 day pre-general C4.	429
15	OPPORTUNITY FOR OLYMPIA	5/11/2016	\$2,000.00	RAISE REVENUE TO INVEST IN HIGHER EDUCATION	This should have been reported as debt on the C4 covering the time period of April 2016.	589
16	JOINT COUNCIL OF TEAMSTERS NO. 28	5/2/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of April 2016.	589

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516	As of --		12/21/2017	
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx . days late
17	HUEBNER, DOOLEY & MCGINNESS, P.S.	5/2/2016	\$360.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of April 2016.	589
18	HUEBNER, DOOLEY & MCGINNESS, P.S.	3/1/2016	\$360.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of February 2016.	651
19	JOINT COUNCIL OF TEAMSTERS NO. 28	3/1/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of February 2016.	651
20	HUEBNER, DOOLEY & MCGINNESS, P.S.	6/8/2016	\$360.00	ACCOUNTING FEE	This should have been reported as debt on the C4 covering the time period of May 2016.	559
21	JOINT COUNCIL OF TEAMSTERS NO. 28	6/8/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2016.	559
22	WAYPOINT CONSULTING GROUP, LLC	6/16/2016	\$367.20	REIMBURSEMENT FOR TRAVEL EXPENSES TO SPOKANE, WA LOCAL 690	This should have been reported as debt on the C4 covering the time period of May 2016.	559
23	BANK OF AMERICA	6/16/2016	\$979.69	TRAVEL AND FOOD FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS	This should have been reported as debt on the C4 covering the time period of May 2016.	559
24	HUEBNER, DOOLEY & MCGINNESS, P.S.	9/1/2016	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the post-primary C4.	465
25	BANK OF AMERICA	9/23/2016	\$711.81	LILY'S TRAVEL EXPENSES FOR CANDIDATE INTERVIEWS	This should have been reported as debt on the post-primary C4.	465
26	HUEBNER, DOOLEY & MCGINNESS, P.S.	10/3/2016	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the post-primary C4.	465
27	JOINT COUNCIL OF TEAMSTERS NO. 28	10/3/2016	\$800.00	RENT	This should have been reported as debt on the post-primary C4.	465
28	THE MARCUS WHITMAN	9/23/2016	\$978.69	TRAVEL EXPENSES FOR DAVID SOTRAASLI TO ATTEND THE JC ANNUAL MEETING	This should have been reported as debt on the post-primary C4.	465
29	TEAMSTERS LOCAL 839	1/12/2017	\$1,442.14	REIMBURSEMENT FOR BRAD TAYLOR'S TRAVEL FOR POLITICAL MEETINGS	This should have been reported as debt on the C4 covering the time period of December 2016.	345
30	HUEBNER, DOOLEY & MCGINNESS, P.S.	11/1/2016	\$365.00	ACCOUNTING RETAINER	This should have been reported as debt on the 7 day pre-general C4.	415
31	BANK OF AMERICA	11/23/2016	\$777.79	FOOD AND BEVERAGE FOR MLKC CANVASS AND PHONE BANK	This should have been reported as debt on the 7 day pre-general C4.	415

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516	As of --		12/21/2017	
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx . days late
32	JOINT COUNCIL OF TEAMSTERS NO. 28	11/1/2016	\$800.00	RENT	This should have been reported as debt on the 7 day pre-general C4.	415
33	CERILLION N4 PARTNERS	11/3/2016	\$20,543.01	PRINTING, MAILING AND TAXES	This should have been reported as debt on the 7 day pre-general C4.	415
34	CERILLION N4 PARTNERS	11/3/2016	\$4,898.99	POSTAGE	This should have been reported as debt on the 7 day pre-general C4.	415
35	CERILLION N4 PARTNERS	11/3/2016	\$6,200.00	DESIGN, EDITING AND CERILLION PARTNER FEE	This should have been reported as debt on the 7 day pre-general C4.	415
36	WASHINGTON FAIR TRADE COALITION	11/30/2016	\$400.00	BREAKFAST TABLE SPONSORSHIP	This should have been reported as debt on the 7 day pre-general C4.	415
37	TEAMSTERS LOCAL 839	1/13/2016	\$905.18	REIMBURSE LOCAL 839 FOR BRAD TAYLOR'S 2015 EXPENSES	This should have been reported as debt on the C4 covering the time period of December 2015.	710
38	HUEBNER, DOOLEY & MCGINNESS, P.S.	1/5/2016	\$360.00	ACCOUNTING FEE	This should have been reported as debt on the C4 covering the time period of December 2015.	710
39	JOINT COUNCIL OF TEAMSTERS NO. 28	1/5/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of December 2015.	710
40	WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE	1/20/2016	\$1,000.00	CRAB FEED	This should have been reported as debt on the C4 covering the time period of December 2015.	710
41	JOINT COUNCIL OF TEAMSTERS NO. 28	2/1/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of January 2016.	680
42	HUEBNER, DOOLEY & MCGINNESS, P.S.	2/1/2016	\$360.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of January 2016.	680
43	JOINT COUNCIL OF TEAMSTERS NO. 28	9/1/2016	\$800.00	RENT	This should have been reported as debt on the post-primary C4.	465
44	HUEBNER, DOOLEY & MCGINNESS, P.S.	12/1/2016	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of November 2016.	374
45	BANK OF AMERICA	12/21/2016	\$465.06	TRAVEL EXPENSES FOOD, HOTEL AND PARKING	This should have been reported as debt on the C4 covering the time period of November 2016.	374
46	JOINT COUNCIL OF TEAMSTERS NO. 28	12/1/2016	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of November 2016.	374
47	JOINT COUNCIL OF TEAMSTERS NO. 28	12/14/2016	\$17,896.33	DAVID STORAASLI WAGES AND BENEFITS FOR MEMBER COMMUNICATION SEPT - NOV 2016	This should have been reported as debt on the C4 covering the time period of November 2016.	374

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516	As of --		12/21/2017	
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx. days late
48	HUEBNER, DOOLEY & MCGINNESS, P.S.	1/3/2017	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of December 2016.	345
49	JOINT COUNCIL OF TEAMSTERS NO. 28	1/3/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of December 2016.	345
50	ABRACADABRA PRINTING	3/24/2017	\$1,557.99	NAME BADGES FOR WTLL EVENTS	This should have been reported as debt on the C4 covering the time period of February 2017.	286
51	JOINT COUNCIL OF TEAMSTERS NO. 28	3/1/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of February 2017.	286
52	HUEBNER, DOOLEY & MCGINNESS, P.S.	3/1/2017	\$365.00	ACCOUNTING FEE	This should have been reported as debt on the C4 covering the time period of February 2017.	286
53	IMAGE POINTE	3/1/2017	\$286.79	SHIRTS FOR LEGISLATIVE LIASONS	This should have been reported as debt on the C4 covering the time period of February 2017.	286
54	BANK OF AMERICA	3/3/2017	\$2,579.04	TRAVEL AND MEALS FOR LOBBYING	This should have been reported as debt on the C4 covering the time period of February 2017.	286
55	BANK OF AMERICA	3/24/2017	\$253.27	MEALS AND TRAVEL FOR JOE KUHN AND JIM PEA	This should have been reported as debt on the C4 covering the time period of February 2017.	286
56	JOINT COUNCIL OF TEAMSTERS NO. 28	4/4/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of March 2017.	255
57	HUEBNER, DOOLEY & MCGINNESS, P.S.	4/4/2017	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of March 2017.	255
58	SCHERWIN CAMPBELL BARNARD & IGLITZIN	4/13/2017	\$496.00	LEGAL RESEARCH ON BILL	This should have been reported as debt on the C4 covering the time period of March 2017.	255
59	BANK OF AMERICA	4/20/2017	\$2,706.18	HOTEL, AIRFARE, TAXI, PARKING AND MEALS FOR THE MONTH OF APRIL	This should have been reported as debt on the C4 covering the time period of March 2017.	255
60	HUEBNER, DOOLEY & MCGINNESS, P.S.	5/2/2017	\$365.00	ACCOUNTING RETAINER	This should have been reported as debt on the C4 covering the time period of April 2017.	225
61	BANK OF AMERICA	5/19/2017	\$496.44	TRAVEL EXPENSES FOR LEG MEETINGS AND LOCAL PRIORITY MEETINGS	This should have been reported as debt on the C4 covering the time period of April 2017.	225
62	JOINT COUNCIL OF TEAMSTERS NO. 28	5/2/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of April 2017.	225
63	RED LION HOTEL	5/19/2017	\$5,700.58	HOTEL AND MEALS FOR TEAMSTER LOBBY DAY AND WOMEN'S LOBBY DAY	This should have been reported as debt on the C4 covering the time period of April 2017.	225

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516		As of -- 12/21/2017		
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx . days late
64	HUEBNER, DOOLEY & MCGINNESS, P.S.	6/1/2017	\$365.00	ACCOUNTING SERVICES	This should have been reported as debt on the C4 covering the time period of May 2017.	194
65	HUEBNER, DOOLEY & MCGINNESS, P.S.	7/3/2017	\$370.00	ACCOUNTING SERVICES	This should have been reported as debt on the C4 covering the time period of May 2017.	194
66	JOINT COUNCIL OF TEAMSTERS NO. 28	6/1/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2017.	194
67	JOINT COUNCIL OF TEAMSTERS NO. 28	7/3/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of May 2017.	194
68	HUEBNER, DOOLEY & MCGINNESS, P.S.	9/1/2017	\$370.00	ACCOUNTING FEES	This should have been reported on the post-primary C4.	101
69	HUEBNER, DOOLEY & MCGINNESS, P.S.	10/2/2017	\$370.00	ACCOUNTING FEES	This should have been reported on the post-primary C4.	101
70	BANK OF AMERICA	10/3/2017	\$1,177.25	TRAVEL EXPENSES FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS FOR OUR MEMBERS	This should have been reported on the post-primary C4.	101
71	YES ON VETS AND HUMAN SERVICES	10/12/2017	\$10,000.00	YES FOR PROP 1	This should have been reported on the post-primary C4.	101
72	PEOPLE FOR JENNY DURKAN	10/12/2017	\$10,000.00	INDEPENDENT EXPENDITURE	This should have been reported on the post-primary C4.	101
73	JOINT COUNCIL OF TEAMSTERS NO. 28	9/1/2017	\$800.00	RENT	This should have been reported on the post-primary C4.	101
74	JOINT COUNCIL OF TEAMSTERS NO. 28	10/2/2017	\$800.00	RENT	This should have been reported on the post-primary C4.	101
75	JOINT COUNCIL OF TEAMSTERS NO. 28	2/3/2017	\$800.00	RENT	This should have been reported as debt on the C4 covering the time period of January 2017.	314
76	HUEBNER, DOOLEY & MCGINNESS, P.S.	2/3/2017	\$365.00	ACCOUNTING FEES	This should have been reported as debt on the C4 covering the time period of January 2017.	314
77	HUEBNER, DOOLEY & MCGINNESS, P.S.	11/3/2017	\$370.00	ACCOUNTING FEES	This should have been reported as debt on the 7 day pre-general C4.	51
78	JOINT COUNCIL OF TEAMSTERS NO. 28	11/3/2017	\$800.00	RENT	This should have been reported as debt on the 7 day pre-general C4.	51
79	CERILLION N4 PARTNERS	11/9/2017	\$9,852.93	POSTAGE FOR MEMBER CONTACT	This should have been reported as debt on the 7 day pre-general C4.	51

Exhibit B -- Illegal failure to timely report Debt

Approximate Cumulative Days Late --		8516	As of --		12/21/2017	
Viol	Vendor	Date	Amount	Description	Debt that was illegally not reported.	Approx . days late
80	CERILLION N4 PARTNERS	11/9/2017	\$14,777.07	PRINTING, MAIL SERVICE, TAX AND DELIVERY FOR MEMBERSHIP CONTACT	This should have been reported as debt on the 7 day pre-general C4.	51
81	CERILLION N4 PARTNERS	11/9/2017	\$4,500.00	DESIGN, EDITING & PARTNERSHIP FOR MEMBERSHIP COMMUNICATION	This should have been reported as debt on the 7 day pre-general C4.	51
82	BANK OF AMERICA	11/16/2017	\$1,318.98	TRAVEL FOR LILY WILSON-CODEGA AND SNACKS FOR MEETINGS	This should have been reported as debt on the 7 day pre-general C4.	51
83	AT & T MOBILITY	11/28/2017	\$394.56	PHONE BANKING FOR OCT/NOV 2017	This should have been reported as debt on the 7 day pre-general C4.	51
84	CERILLION N4 PARTNERS	8/4/2017	\$776.84	PRINTING	This should have been reported as debt on the 7-day pre-primary C4.	149
85	CERILLION N4 PARTNERS	8/4/2017	\$2,913.84	PRINTING MAIL SERVICES AND TAX FOR DRIVE MAILING	This should have been reported as debt on the 7-day pre-primary C4.	149
86	CERILLION N4 PARTNERS	8/4/2017	\$2,300.00	DESIGN, EDITING AND CERILLION PARTNERS	This should have been reported as debt on the 7-day pre-primary C4.	149
87	BANK OF AMERICA	7/31/2017	\$265.06	FOOD AND PARKING FOR MEETINGS	This should have been reported as debt on the 7-day pre-primary C4.	149
88	SCHERWIN CAMPBELL BARNARD & IGLITZIN	8/14/2017	\$440.00	LEGAL ADVICE RE FILLING PROBLEM FOR PDC AND ORCA DATES	This should have been reported as debt on the 7-day pre-primary C4.	149
89	HUEBNER, DOOLEY & MCGINNESS, P.S.	7/31/2017	\$370.00	ACCOUNTING FEES.	This should have been reported as debt on the 7-day pre-primary C4.	149
90	JOINT COUNCIL OF TEAMSTERS NO. 28	8/1/2017	\$800.00	RENT	This should have been reported as debt on the 7-day pre-primary C4.	149
91	BANK OF AMERICA	8/29/2017	\$1,011.91	TRAVEL & MEETING EXPENSES FOR LILY WILSON CODEGA	This should have been reported as debt on the 7-day pre-primary C4.	149
92	BANK OF AMERICA	10/27/2017	\$988.89	TRAVEL AND EXPENSES FOR LILY WILSON-CODEGA AND CANDIDATE INTERVIEWS	This should have been reported as debt on the 21 day pre-general C4.	65
		Total	\$169,689.62			

Schwerin Campbell Barnard Iglitzin & Lavitt LLP

ATTORNEYS AT LAW

Of Counsel Lawrence Schwerin
James D. Oswald

DMITRI IGLITZIN
Iglitzin@workerlaw.com

RECEIVED

January 26, 2018

JAN 30 2018

Tony Perkins
Washington State Attorney General's Office
1125 Washington St SE
Olympia, WA 98504

Public Disclosure Commission

Re: Citizen Action Notice Complaint against Washington Teamsters Legislative League
(PDC Case No. 29798)
Our File No. 3315-018

Dear Mr. Perkins:

We are writing on behalf of the Washington Teamsters Legislative League with regard to the above-referenced matter, in response to the request for a response sent to it by your office on January 12, 2018.

The Washington Teamsters Legislative League has reviewed the allegations that have been made against it by Glen Morgan, and responds as follows:

1. Alleged failure to file accurate and timely C3 and C4 reports.

The Washington Teamsters Legislative League has at all times endeavored to meet all filing requirements, and it believes that it has done so in all material respects. Most of its expenditures and receipts were timely and accurately filed. In some cases, the League made modest and appropriate amendments, consistent with both the Fair Practices Campaign Act and PDC guidance. Mr. Morgan seeks to conflate an amendment with a late filing, which has no basis in law or reason. In still other cases, filing errors were the result of technical difficulties or due date errors attributable to the ORCA system. If any viable allegations do exist, they are legally *de minimis*, more appropriate for resolution by the Public Disclosure Commission than the Superior Court. The Commission has jurisdiction over the allegations; as such, any decision on how to respond to these allegations should be left with the Commission.

2. Alleged failure to timely and accurately report debt.

There is no factual basis for this allegation. The League pays very few vendors, and when it does, it promptly reports those payments. It pays for the goods and services that it acquires upon delivery or production. For example, all checks payable for rent and accounting fees are paid in the current month of the bill. They are not owed for a prior month. The checks that reflect payment for accounting represents payment of a retainer for yearend calculations. And so forth.

18 West Mercer St, Ste 400 | (206) 285.2828 TEL
Seattle, Washington 98119 | (800) 238.4231 TEL
workerlaw.com | (206) 378.4132 FAX

We do not believe that the League has ever, within the time period relevant to this complaint, failed to pay for goods or services on the date payment was requested or due; thus, the League has had had no debt to report and therefore obviously did not fail to report such.

Mr. Morgan appears to confuse “expenditures,” which were in fact properly reported subsequent to being made, and “debt,” which only occurs under very limited circumstances, e.g., where a commitment to pay has been made, with an agreement that payment be made on a specified date, yet payment is not made on that date, and the money is therefore now owed by the campaign committee (in the words of RCW 42.17A.240(8), the debt is now “outstanding”). *See, e.g., Caplan v. Sullivan*, 37 Wn. App. 289, 292–93, 679 P.2d 949 (1984) (“debt” refers to an obligation arising from contract or a sum of money owed which is fixed and certain).

None of the items listed by Mr. Morgan constitute what he refers to as a “debt obligation.” Instead, these items were expenditures that were reported appropriately (and in a timely fashion) subsequent to having been made.

3. Alleged failure to break down expenditures.

Mr. Morgan also alleges that the League violated campaign finance reporting laws by failing to sufficiently break down and describe its expenditures. Although he claims that “[t]he sheer volume of violations of this statute are extensive,” he has not managed to cite even a single example.

The Attorney General and the PDC have previously rejected Mr. Morgan’s contentions regarding his “failure to break down expenditures” claims. For instance, in March 2017, Mr. Morgan filed a complaint with the PDC and a corresponding 45-day notice with the Attorney General alleging that John Wilson, a 2015 candidate for King County assessor, committed various violations of the Act. *See* PDC Ticket No. 14854. Relying on WAC-390-16-37, Morgan claimed that Wilson failed to properly break down twenty-two expenditures. *Id.* Among these allegedly problematic expenditures were various payments Wilson made to Overnight Printing & Graphics and Fedex Office for printing services. *See id.* While Wilson identified on the C-4s the amount and the purpose of the expenditures, he did not list the quantity of the copies he paid for. Despite this, the PDC and the Attorney General declined to take formal action. In so doing the PDC noted that, with the exception of one expenditure that fell outside of the limitations period, all of the expenditures Mr. Morgan flagged as unlawful were “sufficiently identified and accounted for.” *Id.*

In light of the foregoing, it is clear that even if there were some specific expenditures for which more detailed information could potentially have been provided, consistent with WAC 390-16-037(3), which requires that reports “describe in detail the goods and/or services to be provided by the recipient of the expenditure,” at most there might be only a *de minimis* violation here, which would not warrant further action.

4. Alleged failure to file C-6 reports related to independent expenditures.

Mr. Morgan appears to assert that the League has failed to file C-6 reports reflecting independent expenditures. However, the League has never *made* any independent expenditures. The items on the League’s C-4 filings that Mr. Morgan appears to believe warranted C-6 reports were in fact

18 West Mercer St, Ste 400 | (206) 285.2828 TEL
Seattle, Washington 98119 | (800) 238.4231 TEL
workerlaw.com | (206) 378.4132 FAX

Tony Perkins
January 26, 2018
Page 3

contributions to political committees that themselves engage in independent expenditures. Because the League was not itself making independent expenditures, but was instead simply providing money to other political committees, these expenditures were properly reported by the League on its C-4 filings as contributions to those committees. (In addition, because these expenditures are “required to be reported” by the League, due to its status as a political committee, they are in any event not “independent expenditures” for which a C-6 filing (a “special report”) could be required. See RCW 42.17A.255(1).)

For all of the reasons set forth above, Washington Teamsters Legislative League urges the Attorney General to decline to initiate a formal action against it and refer the matter to the PDC for further investigation if the PDC sees fit.

Sincerely,



Dmitri Iglitzin
Counsel for Teamsters Legislative League

Cc: Fox Blackhorn, PDC

18 West Mercer St, Ste 400 | (206) 285.2828 TEL
Seattle, Washington 98119 | (800) 238.4231 TEL
workerlaw.com | (206) 378.4132 FAX

Washington Teamsters Legislative League (WTLL) PDC Case 29798
Alleged Failure to Report Debt (From Exhibit B to Complaint)

No.	Vendor	Date	Amount	Description	Alleged Failure to Report as Debt on Prior Report
5	BANK OF AMERICA	7/25/2016	\$1,029.60	MEALS, SNACKS, HOTEL & FERRY RIDES FOR CANDDIATE INTERVIEWS	Allegedly reportable as debt on the 21 day pre-primary C4.
8	BANK OF AMERICA	8/24/2016	\$346.21	TRAVEL FOR CANDIDATE INTERVIEWS AND MEETING WITH HOUSE REPS WITH LOCAL 589 AND LOCAL 117	Allegedly reportable as debt on the 7-day pre-primary C4.
10	CERILLION N4 PARTNERS	8/24/2016	\$895.49	POSTAGE	Allegedly reportable as debt on the 7-day pre-primary C4.
11	CERILLION N4 PARTNERS	8/24/2016	\$2,252.32	PRINTING AND MAILING OF DRIVE NOTIFCATION	Allegedly reportable as debt on the 7-day pre-primary C4.
12	CERILLION N4 PARTNERS	8/24/2016	\$2,300.00	DESIGN, EDITING AND CERILLION PARTNERS	Allegedly reportable as debt on the 7-day pre-primary C4.
14	BANK OF AMERICA	10/20/2016	\$277.99	TRAVEL EXPENSES FOR LILY WILSON-CODEGA	Allegedly reportable as debt on the 21 day pre-general C4.
22	WAYPOINT CONSULTING GROUP, LLC	6/16/2016	\$367.20	REIMBURSEMENT FOR TRAVEL EXPENSES TO SPOKANE, WA LOCAL 690	Allegedly reportable as debt on the C4 covering the time period of May 2016.
23	BANK OF AMERICA	6/16/2016	\$979.69	TRAVEL AND FOOD FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS	Allegedly reportable as debt on the C4 covering the time period of May 2016.
25	BANK OF AMERICA	9/23/2016	\$711.81	LILY'S TRAVEL EXPENSES FOR CANDIDATE INTERVIEWS	Allegedly reportable as debt on the post-primary C4.
28	THE MARCUS WHITMAN	9/23/2016	\$978.69	TRAVEL EXPENSES FOR DAVID SOTRAASLI TO ATTEND THE JC ANNUAL MEETING	Allegedly reportable as debt on the post-primary C4.
29	TEAMSTERS LOCAL 839	1/12/2017	\$1,442.14	REIMBURSEMENT FOR BRAD TAYLOR'S TRAVEL FOR POLITICAL MEETINGS	Allegedly reportable as debt on the C4 covering the time period of December 2016.
31	BANK OF AMERICA	11/23/2016	\$777.79	FOOD AND BEVERAGE FOR MLKC CANVASS AND PHONE BANK	Allegedly reportable as debt on the 7 day pre-general C4.
33	CERILLION N4 PARTNERS	11/3/2016	\$20,543.01	PRINTING, MAILING AND TAXES	Allegedly reportable as debt on the 7 day pre-general C4.
34	CERILLION N4 PARTNERS	11/3/2016	\$4,898.99	POSTAGE	Allegedly reportable as debt on the 7 day pre-general C4.
35	CERILLION N4 PARTNERS	11/3/2016	\$6,200.00	DESIGN, EDITING AND CERILLION PARTNER FEE	Allegedly reportable as debt on the 7 day pre-general C4.
37	TEAMSTERS LOCAL 839	1/13/2016	\$905.18	REIMBURSE LOCAL 839 FOR BRAD TAYLOR'S 2015 EXPENSES	Allegedly reportable as debt on the C4 covering the time period of December 2015.
45	BANK OF AMERICA	12/21/2016	\$465.06	TRAVEL EXPENSES FOOD, HOTEL AND PARKING	Allegedly reportable as debt on the C4 covering the time period of November 2016.
47	JOINT COUNCIL OF TEAMSTERS NO. 28	12/14/2016	\$17,896.33	DAVID STORAASLI WAGES AND BENEFITS FOR MEMBER COMMUNICATION SEPT - NOV 2016	Allegedly reportable as debt on the C4 covering the time period of November 2016.

Washington Teamsters Legislative League (WTLL) PDC Case 29798
Alleged Failure to Report Debt (From Exhibit B to Complaint)

No.	Vendor	Date	Amount	Description	Alleged Failure to Report as Debt on Prior Report
50	ABRACADABRA PRINTING	3/24/2017	\$1,557.99	NAME BADGES FOR WTLL EVENTS	Allegedly reportable as debt on the C4 covering the time period of February 2017.
53	IMAGE POINTE	3/1/2017	\$286.79	SHIRTS FOR LEGISLATIVE LIASONS	Allegedly reportable as debt on the C4 covering the time period of February 2017.
54	BANK OF AMERICA	3/3/2017	\$2,579.04	TRAVEL AND MEALS FOR LOBBYING	Allegedly reportable as debt on the C4 covering the time period of February 2017.
55	BANK OF AMERICA	3/24/2017	\$253.27	MEALS AND TRAVEL FOR JOE KUHN AND JIM PEA	Allegedly reportable as debt on the C4 covering the time period of February 2017.
59	BANK OF AMERICA	4/20/2017	\$2,706.18	HOTEL, AIRFARE, TAXI, PARKING AND MEALS FOR THE MONTH OF APRIL	Allegedly reportable as debt on the C4 covering the time period of March 2017.
61	BANK OF AMERICA	5/19/2017	\$496.44	TRAVEL EXPENSES FOR LEG MEETINGS AND LOCAL PRIORITY MEETINGS	Allegedly reportable as debt on the C4 covering the time period of April 2017.
63	RED LION HOTEL	5/19/2017	\$5,700.58	HOTEL AND MEALS FOR TEAMSTER LOBBY DAY AND WOMEN'S LOBBY DAY	Allegedly reportable as debt on the C4 covering the time period of April 2017.
70	BANK OF AMERICA	10/3/2017	\$1,177.25	TRAVEL EXPENSES FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS FOR OUR MEMBERS	Allegedly reportable on the post-primary C4.
79	CERILLION N4 PARTNERS	11/9/2017	\$9,852.93	POSTAGE FOR MEMBER CONTACT	Allegedly reportable as debt o the 7 day pre-general C4.
80	CERILLION N4 PARTNERS	11/9/2017	\$14,777.07	PRINTING, MAIL SERVICE, TAX AND DELIVERY FOR MEMBERSHIP CONTACT	Allegedly reportable as debt o the 7 day pre-general C4.
81	CERILLION N4 PARTNERS	11/9/2017	\$4,500.00	DESIGN, EDITING & PARTNERSHIP FOR MEMBERSHIP COMMUNICATION	Allegedly reportable as debt o the 7 day pre-general C4.
82	BANK OF AMERICA	11/16/2017	\$1,318.98	TRAVEL FOR LILY WILSON-CODEGA AND SNACKS FOR MEETINGS	Allegedly reportable as debt o the 7 day pre-general C4.
83	AT & T MOBILITY	11/28/2017	\$394.56	PHONE BANKING FOR OCT/NOV 2017	Allegedly reportable as debt o the 7 day pre-general C4.
84	CERILLION N4 PARTNERS	8/4/2017	\$776.84	PRINTING	Allegedly reportable as debt on the 7-day pre-primary C4.
85	CERILLION N4 PARTNERS	8/4/2017	\$2,913.84	PRINTING MAIL SERVICES AND TAX FOR DRIVE MAILING	Allegedly reportable as debt on the 7-day pre-primary C4.
86	CERILLION N4 PARTNERS	8/4/2017	\$2,300.00	DESIGN, EDITING AND CERILLION PARTNERS	Allegedly reportable as debt on the 7-day pre-primary C4.
87	BANK OF AMERICA	7/31/2017	\$265.06	FOOD AND PARKING FOR MEETINGS	Allegedly reportable as debt on the 7-day pre-primary C4.
91	BANK OF AMERICA	8/29/2017	\$1,011.91	TRAVEL & MEETING EXPENSES FOR LILY WILSON CODEGA	Allegedly reportable as debt on the 7-day pre-primary C4.
92	BANK OF AMERICA	10/27/2017	\$988.89	TRAVEL AND EXPENSES FOR LILY WILSON-CODEGA AND CANDIDATE INTERVIEWS	Allegedly reportable as debt on the 21 day pre-general C4.
		Total	\$117,125.12		

Washington Teamsters Legislative League (WTLL) PDC Case 29798
Possible Failure to Include Proper Description for Expenditures (From Exhibit B to Complaint)

No.	Vendor	Date	Amount	Description	Expenditure Without Proper Description
5	BANK OF AMERICA	7/25/2016	\$1,029.60	MEALS, SNACKS, HOTEL & FERRY RIDES FOR CANDIDATE INTERVIEWS	Description fails to list individual vendors comprising the credit card payment.
8	BANK OF AMERICA	8/24/2016	\$346.21	TRAVEL FOR CANDIDATE INTERVIEWS AND MEETING WITH HOUSE REPS WITH LOCAL 589 AND LOCAL 117	Description fails to list individual vendors comprising the credit card payment.
14	BANK OF AMERICA	10/20/2016	\$277.99	TRAVEL EXPENSES FOR LILY WILSON-CODEGA	Description fails to list individual vendors comprising the credit card payment.
22	WAYPOINT CONSULTING GROUP, LLC	6/16/2016	\$367.20	REIMBURSEMENT FOR TRAVEL EXPENSES TO SPOKANE, WA LOCAL 690	Description fails to list individual vendors comprising the reimbursement.
23	BANK OF AMERICA	6/16/2016	\$979.69	TRAVEL AND FOOD FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS	Description fails to list individual vendors comprising the credit card payment.
25	BANK OF AMERICA	9/23/2016	\$711.81	LILY'S TRAVEL EXPENSES FOR CANDIDATE INTERVIEWS	Description fails to list individual vendors comprising the credit card payment.
28	THE MARCUS WHITMAN	9/23/2016	\$978.69	TRAVEL EXPENSES FOR DAVID SOTRAASLI TO ATTEND THE JC ANNUAL MEETING	Description fails to list individual vendors comprising the reimbursement.
29	TEAMSTERS LOCAL 839	1/12/2017	\$1,442.14	REIMBURSEMENT FOR BRAD TAYLOR'S TRAVEL FOR POLITICAL MEETINGS	Description fails to list individual vendors comprising the reimbursement.
31	BANK OF AMERICA	11/23/2016	\$777.79	FOOD AND BEVERAGE FOR MLKC CANVASS AND PHONE BANK	Description fails to list individual vendors comprising the credit card payment.
37	TEAMSTERS LOCAL 839	1/13/2016	\$905.18	REIMBURSE LOCAL 839 FOR BRAD TAYLOR'S 2015 EXPENSES	Description fails to list individual vendors comprising the reimbursement.
45	BANK OF AMERICA	12/21/2016	\$465.06	TRAVEL EXPENSES FOOD, HOTEL AND PARKING	Description fails to list individual vendors comprising the credit card payment.
54	BANK OF AMERICA	3/3/2017	\$2,579.04	TRAVEL AND MEALS FOR LOBBYING	Description fails to list individual vendors comprising the credit card payment.
55	BANK OF AMERICA	3/24/2017	\$253.27	MEALS AND TRAVEL FOR JOE KUHN AND JIM PEA	Description fails to list individual vendors comprising the credit card payment.
59	BANK OF AMERICA	4/20/2017	\$2,706.18	HOTEL, AIRFARE, TAXI, PARKING AND MEALS FOR THE MONTH OF APRIL	Description fails to list individual vendors comprising the credit card payment.
61	BANK OF AMERICA	5/19/2017	\$496.44	TRAVEL EXPENSES FOR LEG MEETINGS AND LOCAL PRIORITY MEETINGS	Description fails to list individual vendors comprising the credit card payment.
70	BANK OF AMERICA	10/3/2017	\$1,177.25	TRAVEL EXPENSES FOR LILY WILSON-CODEGA AND SNACKS FOR CANDIDATE INTERVIEWS FOR OUR MEMBERS	Description fails to list individual vendors comprising the credit card payment.
82	BANK OF AMERICA	11/16/2017	\$1,318.98	TRAVEL FOR LILY WILSON-CODEGA AND SNACKS FOR MEETINGS	Description fails to list individual vendors comprising the credit card payment.

Washington Teamsters Legislative League (WTLL) PDC Case 29798
Possible Failure to Include Proper Description for Expenditures (From Exhibit B to Complaint)

No.	Vendor	Date	Amount	Description	Expenditure Without Proper Description
87	BANK OF AMERICA	7/31/2017	\$265.06	FOOD AND PARKING FOR MEETINGS	Description fails to list individual vendors comprising the credit card payment.
91	BANK OF AMERICA	8/29/2017	\$1,011.91	TRAVEL & MEETING EXPENSES FOR LILY WILSON CODEGA	Description fails to list individual vendors comprising the credit card payment.
92	BANK OF AMERICA	10/27/2017	\$988.89	TRAVEL AND EXPENSES FOR LILY WILSON-CODEGA AND CANDIDATE INTERVIEWS	Description fails to list individual vendors comprising the credit card payment.
		Total	\$19,078.38		