

To Whom it May Concern --

It has come to my attention that Sharon Santos, a 2016 candidate for for the Washington State House of Representatives, has violated provisions of **RCW 42.17A**.

1) Failure to timely file Statement of Organization (C1/C1PC). (Violation of RCW 42.17A.205 (1))

State law requires that candidates file their C1 within 2 weeks of receiving contributions or making expenditures, whichever is earliest.

Santos began accepting contributions for her 2016 campaign on 12/7/2015, giving her until 12/21/15 to file a C1. Unfortunately, Santos failed to file a C1 until 5/23/2016, **over 6 months past the statutory deadline.**

2) Failure to timely file C3 & C4 reports on day C1 is filed. (Violation of RCW 42.17A.235(1))

State law requires that candidates and committees submit reports containing all contributions received and expenditures made on the same day they submit their statement of registration (C1).

Santos filed her C1 on 5/23/2016, however she failed to report having received the following contributions prior to that day:

12/11/2015 \$950.00 PUGET SOUND ENERGY
12/11/2015 \$950.00 PUGET SOUND ENERGY
12/11/2015 \$500.00 WELLS FARGO EMPLOYEE PAC
12/11/2015 \$950.00 CASH AMERICA
12/11/2015 \$950.00 WASHINGTON STATE DENTAL PAC
12/7/2015 \$950.00 PEMCO MUTUAL INSURANCE COMPANY
12/7/2015 \$950.00 USAA
12/7/2015 \$950.00 WASHINGTON STATE AUTO DEALERS PAC
12/7/2015 \$950.00 CAMPAIGN FOR TRIBAL SELF-RELIANCE/WASHINGTON INDIAN GAMING ASSOC
12/7/2015 \$950.00 DELTA DENTAL OF WASHINGTON
12/7/2015 \$250.00 WASHINGTON RESTAURANT ASSOCIATION PAC
12/7/2015 \$400.00 VIDEO GAME IMPACT, INC
12/7/2015 \$400.00 VULCAN INC
12/7/2015 \$500.00 PREMERA BLUE CROSS
12/7/2015 \$500.00 AT&T
12/7/2015 \$500.00 WASHINGTON BEER & WINE DISTRIBUTORS ASSOCIATION P.A.C.
12/7/2015 \$500.00 JUSTICE FOR ALL PAC

These contributions were not reported until 7/10/2016, **181 days past the statutory deadline.**

3) 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, and in-kind contributions.

Unfortunately, Sharon Santos has failed on numerous occasions to do this. (See Exhibits A - "Illegally late deposits and contributions" and Exhibit B "Illegally late reported expenditures").

Please note this includes \$22,524 in contributions many of them over 181 days late and over \$2,205 expenditures illegally reported late.

4) 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.

Sharon Santos illegally failed to report the following debts: (See Exhibit C - "Illegal failure to report debt").

5) 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.

Sharon Santos illegally failed to break down the following expenses. (See Exhibit D - "Illegal failure to break down expenditures")

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

Santos failed to list committee officers, which is required by **RCW 42.17A.205(2)(c)**. Specifically, she failed to list Derek Ishihara -- her campaign manager.

Ishihara, in conjunction with others, made, directed, or authorized expenditures, strategic or policy decisions on behalf of the committee.

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee" .

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

On information and belief, despite making decisions for the Committee, Derek Ishihara was not listed as a committee officer. This is a violation of state law.

The PDC should investigate the possibility that Santos committed the above violations maliciously. If these violations were committed in an effort to evade public scrutiny and campaign finance disclosure, this 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.

Best Regards,

Glen Morgan

Exhibit A -- Illegally Late Reported/Deposited Contributions

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
1	12/7/2015	1/11/2016	7/10/2016	181	\$ 950.00	PEMCO MUTUAL INSURANCE COMPANY
2	12/7/2015	1/11/2016	7/10/2016	181	\$ 950.00	USAA
3	12/7/2015	1/11/2016	7/10/2016	181	\$ 950.00	WASHINGTON STATE AUTO DEALERS PAC
4	12/7/2015	1/11/2016	7/10/2016	181	\$ 950.00	CAMPAIGN FOR TRIBAL SELF-RELIANCE/WASHINGTON INDIAN GAMING ASSOC
5	12/7/2015	1/11/2016	7/10/2016	181	\$ 950.00	DELTA DENTAL OF WASHINGTON
6	12/11/2015	1/11/2016	7/10/2016	181	\$ 950.00	PUGET SOUND ENERGY
7	12/11/2015	1/11/2016	7/10/2016	181	\$ 950.00	PUGET SOUND ENERGY

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
8	12/11/2015	1/11/2016	7/10/2016	181	\$ 500.00	WELLS FARGO EMPLOYEE PAC
9	12/11/2015	1/11/2016	7/10/2016	181	\$ 950.00	CASH AMERICA
10	12/11/2015	1/11/2016	7/10/2016	181	\$ 950.00	WASHINGTON STATE DENTAL PAC
11	12/7/2015	1/11/2016	7/10/2016	181	\$ 250.00	WASHINGTON RESTAURANT ASSOCIATION PAC
12	12/7/2015	1/11/2016	7/10/2016	181	\$ 400.00	VIDEO GAME IMPACT, INC
13	12/7/2015	1/11/2016	7/10/2016	181	\$ 400.00	VULCAN INC
14	12/7/2015	1/11/2016	7/10/2016	181	\$ 500.00	PREMERA BLUE CROSS
15	12/7/2015	1/11/2016	7/10/2016	181	\$ 500.00	AT&T

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
16	12/7/2015	1/11/2016	7/10/2016	181	\$ 500.00	WASHINGTON BEER & WINE DISTRIBUTORS ASSOCIATION P.A.C.
17	12/7/2015	1/11/2016	7/10/2016	181	\$ 500.00	JUSTICE FOR ALL PAC
18	9/9/2016	9/12/2016	9/23/2016	11	\$ 300.00	WASHINGTON RURAL ELECTRIC PAC
19	9/9/2016	9/12/2016	9/23/2016	11	\$ 100.00	KAWAKAMI ROD
20	9/9/2016	9/12/2016	9/23/2016	11	\$ 100.00	KAWAKAMI KRISTINE
21	7/20/2016	7/25/2016	7/30/2016	5	\$ 250.00	WONG DOROTHY
22	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	WASHINGTON SCHOOL PRINCIPALS LEGISLATIVE EFFECTIVENESS ASSOCIATION

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
23	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	YOUNGS MARKET COMPANY
24	7/20/2016	7/25/2016	7/30/2016	5	\$ 7.00	ROSETE MARVIN
25	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	SEIU HEALTHCARE 1199 NW
26	7/20/2016	7/25/2016	7/30/2016	5	\$ 250.00	WONG DOROTHY
27	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	WASHINGTON SCHOOL PRINCIPALS LEGISLATIVE EFFECTIVENESS ASSOCIATION
28	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	YOUNGS MARKET COMPANY
29	7/20/2016	7/25/2016	7/30/2016	5	\$ 7.00	ROSETE MARVIN
30	7/20/2016	7/25/2016	7/30/2016	5	\$ 1,000.00	SEIU HEALTHCARE 1199 NW
31	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	YOUNG LUCINDA

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
32	12/9/2016	1/10/2017	1/11/2017	1	\$ 50.00	ROSENBERGER ROBERT
33	12/9/2016	1/10/2017	1/11/2017	1	\$ 200.00	KUROSE RUTHANN
34	12/9/2016	1/10/2017	1/11/2017	1	\$ 500.00	XIAO MING
35	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	CHEN BEN
36	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	KUROSE-WOO MARIE
37	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	BASU SUTAPA
38	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	LEUNG JIMMY
39	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	JIMMY JIM
40	12/9/2016	1/10/2017	1/11/2017	1	\$ 200.00	POLINTAN ODETTE
41	12/9/2016	1/10/2017	1/11/2017	1	\$ 50.00	KRISOLOGO-ELLIOTT CRISTINA J
42	12/9/2016	1/10/2017	1/11/2017	1	\$ 50.00	WORTHLEY HEATHER
43	12/9/2016	1/10/2017	1/11/2017	1	\$ 100.00	TAOKA SUE
44	12/9/2016	1/10/2017	1/11/2017	1	\$ 25.00	SASAKI MAY K
45	12/9/2016	1/10/2017	1/11/2017	1	\$ 1,000.00	WASHINGTON CONSUMER FINANCE EDUCATION PAC

Violation #	Contribution_date	Due Date (approximate)	Date Reported	Dates Late (approximate)	Amount	Contributor
46	12/9/2016	1/10/2017	1/11/2017	1	\$ 200.00	OKAZAKI MARK
47	12/9/2016	1/10/2017	1/11/2017	1	\$ 75.00	OKAMOTO TOSHIKO
48	12/9/2016	1/10/2017	1/11/2017	1	\$ 75.00	OKAMOTO TOSHIKAZU
49	12/9/2016	1/10/2017	1/11/2017	1	\$ 285.00	Unitemized

Total \$ 22,524.00

Exhibit B -- Illegally Late Reported Expenditures

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description	Notes
1	1/26/2015	2/28/2015	7/10/2016	498	CONSTANT CONTACT	\$38.33	EMAIL MANAGEMENT SUBSCRIPTION	
2	1/21/2015	2/28/2015	7/10/2016	498	WA STATE LABOR & INDUSTRIES	\$88.61	PAYROLL TAXES	
3	1/5/2015	2/28/2015	7/10/2016	498	US POST OFFICE	\$107.80	STAMPS	
4	3/2/2015	4/10/2015	7/10/2016	457	PAYCHEX	\$126.25	PAYROLL SERVICES	
5	3/2/2015	4/10/2015	7/10/2016	457	PAYCHEX	\$24.50	POSTAGE AND HANDLING	
6	4/10/2015	5/11/2015	7/10/2016	426	PAYCHEX	\$49.00	PAYROLL SERVICES	
7	5/11/2015	6/10/2015	7/10/2016	396	PAYCHEX	\$60.00	PAYROLL SERVICES	
8	5/11/2015	6/10/2015	7/10/2016	396	PAYCHEX	\$10.50	POSTAGE AND HANDLING	
9	7/10/2015	7/14/2015	7/10/2016	362	PAYCHEX	\$54.00	PAYROLL SERVICES	
10	6/10/2015	7/14/2015	7/10/2016	362	PAYCHEX	\$54.00	PAYROLL SERVICES	
11	8/10/2015	9/10/2015	7/10/2016	304	PAYCHEX	\$65.00	PAYROLL SERVICES	
12	8/10/2015	9/10/2015	7/10/2016	304	PAYCHEX	\$10.50	POSTAGE AND HANDLING	
13	9/10/2015	10/13/2015	7/10/2016	271	PAYCHEX	\$54.00	PAYROLL SERVICES	
14	9/17/2015	10/13/2015	7/10/2016	271	US POST OFFICE	\$276.00	POST OFFICE BOX RENTAL	
15	10/13/2015	10/27/2015	7/10/2016	257	PAYCHEX	\$65.00	PAYROLL SERVICES	
16	10/13/2015	10/27/2015	7/10/2016	257	PAYCHEX	\$10.50	POSTAGE AND HANDLING	
17	11/10/2015	12/10/2015	7/10/2016	213	PAYCHEX	\$54.00	PAYROLL SERVICES	
18	12/11/2015	1/11/2016	7/10/2016	181	PAYCHEX	\$54.00	PAYROLL SERVICES	
19	1/11/2016	2/10/2016	7/10/2016	151	PAYCHEX	\$54.00	PAYROLL SERVICES	
20	2/10/2016	3/10/2016	7/10/2016	122	PAYCHEX	\$65.00	PAYROLL SERVICES	
21	2/10/2016	3/10/2016	7/10/2016	122	PAYCHEX	\$24.50	POSTAGE AND HANDLING	
22	3/10/2016	4/11/2016	7/10/2016	90	PAYCHEX	\$54.00	PAYROLL SERVICES	

Violation #	Expenditure Date	Due Date	Date Reported	Days Late	Vendor/Unitemized Expenditures	Amount	Description	Notes
23	4/11/2016	5/11/2016	7/10/2016	60	PAYCHEX	\$54.00	PAYROLL SERVICES	
24	11/26/2016	12/12/2016	1/15/2017	34	APACE	\$215.40	ADS IN IE, NW ASIAN WEEKLY, SEATTLE CHINESE POST	(in-kind contribution)
25	5/10/2016	6/10/2016	7/10/2016	30	PAYCHEX	\$65.00	PAYROLL SERVICES	
26	5/10/2016	6/10/2016	7/10/2016	30	PAYCHEX	\$10.50	POSTAGE AND HANDLING	
27	5/16/2016	6/10/2016	7/10/2016	30	KING COUNTY RECORDS & ELECTIONS	\$454.74	CANDIDATE FILING	
28	5/23/2016	6/10/2016	7/10/2016	30	WASHINGTON STATE TREASURY	\$5.00	PHOTO	
29	5/16/2016	6/10/2016	7/10/2016	30	KING COUNTY RECORDS & ELECTIONS	\$1.49	E COMMERCE FEE	

Total \$2,205.62

Exhibit C -- Illegal Failure to Report Debt

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
1	ISHIHARA DEREK S	2016-06-15	\$ 900.00	SALARY	This should have been reported as debt on the C4 covering the time period of May.
2	ISHIHARA DEREK S	2016-06-30	\$ 900.00	SALARY	This should have been reported as debt on the C4 covering the time period of May.
3	ISHIHARA DEREK S	2016-06-15	\$ 642.86	SALARY	This should have been reported as debt on the C4 covering the time period of May.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
4	OVERNIGHT PRINTING AND GRAPHICS	2016-06-20	\$ 500.90	PRINTING	This should have been reported as debt on the C4 covering the time period of May.
5	37TH DISTRICT DEMOCRATS	2016-09-09	\$ 500.00	CAMPAIGN AD	This should have been reported as debt on the 7-day preprimary C4.
6	SOUTHSIDE COMMONS	2016-07-02	\$ 300.00	FACILITY RENTAL	This should have been reported as debt on the C4 covering the time period of June.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
7	US POST OFFICE	2016-09-09	\$ 280.00	ANNUAL PO BOX RENT	This should have been reported as debt on the 7-day preprimary C4.
8	US POST OFFICE	2015-09-17	\$ 276.00	POST OFFICE BOX RENTAL	This should have been reported as debt on the C4 covering the time period of August 2015.
9	US TREASURY	2016-06-15	\$ 127.29	FEDERAL PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
10	PAYCHEX	2015-03-02	\$ 126.25	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
11	US TREASURY	2016-06-30	\$ 90.75	FEDERAL PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.
12	WA STATE LABOR & INDUSTRIES	2015-01-21	\$ 88.61	PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
13	PAYCHEX	2016-06-15	\$ 71.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
14	PAYCHEX	2016-06-30	\$ 71.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
15	PAYCHEX	2016-05-10	\$ 65.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
16	PAYCHEX	2016-02-10	\$ 65.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
17	PAYCHEX	2015-08-10	\$ 65.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
18	PAYCHEX	2015-10-13	\$ 65.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
19	PAYCHEX	2015-05-11	\$ 60.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
20	PAYCHEX	2016-06-10	\$ 58.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
21	PAYCHEX	2016-03-10	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
22	PAYCHEX	2016-04-11	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
23	PAYCHEX	2015-06-10	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
24	PAYCHEX	2015-07-10	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
25	PAYCHEX	2015-11-10	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
26	PAYCHEX	2015-12-11	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
27	PAYCHEX	2016-01-11	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
28	PAYCHEX	2015-09-10	\$ 54.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
29	PAYCHEX	2015-04-10	\$ 49.00	PAYROLL SERVICES	This should have been reported as contractual debt on an ongoing basis.
30	WA STATE EMPLOYMENT SECURITY DEPT	2016-06-15	\$ 18.05	STATE PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
31	WA STATE EMPLOYMENT SECURITY DEPT	2016-06-30	\$ 12.87	STATE PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.
32	WA STATE LABOR & INDUSTRIES	2016-06-15	\$ 6.32	STATE PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.
33	WA STATE LABOR & INDUSTRIES	2016-06-30	\$ 6.32	STATE PAYROLL TAXES	This should have been reported as contractual debt on an ongoing basis.

Violation #	Vendor	Date	Amount	Description	Debt that was illegally not reported.
34	WA STATE LABOR & INDUSTRIES	2016-10-20	\$ 3.73	WA STATE PAYROLL TAX	This should have been reported as contractual debt on an ongoing basis.

Total \$ 5,780.95

Exhibit D -- Illegal Failure to breakdown expenditures.

Violation #	Vendor	Date	Amount	Description	
1	OVERNIGHT PRINTING AND GRAPHICS	2016-06-20	\$500.90	PRINTING	Failure to identify items being printed.
2	ISHIHARA DEREK S	2016-06-30	\$200.00	HEALTH INSURANCE STIPEND	Failure to identify health insurance being purchased .
3	US TREASURY	2016-06-15	\$127.29	FEDERAL PAYROLL TAXES	Failure to identify who payroll taxes were being paid for.

Violation #	Vendor	Date	Amount	Description	
4	PAYCHEX	2015-03-02	\$126.25	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
5	US TREASURY	2016-06-30	\$90.75	FEDERAL PAYROLL TAXES	Failure to identify who payroll taxes were being paid for.
6	WA STATE LABOR & INDUSTRIES	2015-01-21	\$88.61	PAYROLL TAXES	Failure to identify who payroll taxes were being paid for.

Violation #	Vendor	Date	Amount	Description	
7	PAYCHEX	2016-06-15	\$71.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
8	PAYCHEX	2016-06-30	\$71.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
9	PAYCHEX	2016-05-10	\$65.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Violation #	Vendor	Date	Amount	Description	
10	PAYCHEX	2016-02-10	\$65.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
11	PAYCHEX	2015-08-10	\$65.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
12	PAYCHEX	2015-10-13	\$65.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Violation #	Vendor	Date	Amount	Description	
13	PAYCHEX	2015-05-11	\$60.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
14	PAYCHEX	2016-06-10	\$58.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
15	PAYCHEX	2016-03-10	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Violation #	Vendor	Date	Amount	Description	
16	PAYCHEX	2016-04-11	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
17	PAYCHEX	2015-06-10	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
18	PAYCHEX	2015-07-10	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Violation #	Vendor	Date	Amount	Description	
19	PAYCHEX	2015-11-10	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
20	PAYCHEX	2015-12-11	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.
21	PAYCHEX	2016-01-11	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Violation #	Vendor	Date	Amount	Description	
22	PAYCHEX	2015-09-10	\$54.00	PAYROLL SERVICES	Failure to identify who payroll services were being provided for.

Total \$2,085.80