

To Whom it May Concern –

It has come to my attention that King County Working Families PAC has violated provisions of **RCW 42.17A**.

1) Maliciously and deceptively misidentifying De'Sean Quinn as the Mayor of Tukwila (Violation of RCW 42.17A.335(1)(b))

State law prohibits candidates and political committees from misrepresenting a candidate's incumbency in political advertising.

Unfortunately, King County Working Families PAC misrepresented De'Sean Quinn in a mailer, identifying him as "Tukwila Mayor De'Sean Quinn". De'Sean Quinn was not, and is not the Mayor of Tukwila. This was done intentionally by a PAC that was funded by big special interests. Fortunately, their last-minute attempt to install their candidate into the position was foiled by voters who saw through the lie. (See attached)

2) Illegal collaboration between Committee and candidates, over limit contribution to candidates (Violation of RCW 42.17A.405)

State law prohibits illegal collaboration between candidates and committees who do independent expenditures.

Unfortunately, it is highly likely that the officers of this committee illegally collaborated with the candidates they assisted. This constitutes an inkind contribution to their campaigns substantially in excess of the maximum allowable by law. This is a clear violation.

The PDC should immediately subpoena the records of the Committee to confirm and verify the true degree, scope, and level of willful malicious collusion to which this violation has occurred.

3) 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.

King County Working Families PAC failed to illegally report the following debts on preceding C4s: **(See file labelled "KCWFPAC Illegally hidden debt" attached)**

4) 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.

King County Working Families PAC illegally failed to break down the following expenses: **(see file labelled "KCWF PAC Illegally hidden expenses" attached).**

5) Failure to report expenditure/in-kind contribution for professional photography. (Violation of RCW 42.17A.235)

King County Working Families PAC failed to report expenditures/in-kind contribution for professional photography. You can find examples of this professional photography in their many mailers, one of which is attached.

The source (and value) of these pieces of professional photography must be reported. It is likely that the PAC collaborated with the candidates to obtain this photography.

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

King County Working Families PAC sent out mailers to registered voters within SeaTac and Tukwila.

King County Working Families PAC 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 candidates actually pay hundreds of dollars for mailing lists from vendors such as L2.

Unfortunately, because King County Working Families PAC failed to report the expenditure for said mailing lists, or the in-kind contribution of mailing lists from some outside entity, they are in violation of **RCW 42.17A.235**.

King County Working Families PAC must amend its campaign finance reports to include the source of the mailing lists, either as an in-kind contribution to the committee or as an expenditure.

7) Failure to list David Rolf as a committee officer. (Violation of RCW 42.17A.205 (2)(c), see WAC 390-05-245.

King County Working Families PAC failed to list David Rolf as an officer, which is required by **RCW 42.17A.205(2)(c)**.

I believe that Rolf should have been listed as a committee officer, because Rolf, 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" .

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."

8) 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..."

I believe that Rolf illegally made and directed expenditures for the committee, in violation of state law.

9) Potential illegal use of campaign funds for personal purposes. (Violation of RCW 42.17A.445)

King County Working Families PAC illegally used campaign funds for personal purposes in the following instances:

STEP FORWARD WA 3/31/2016 \$3,500.00 SEATTLE WA 98101 DONATION

After extensive research, it is unclear what this organization is or if it even existed. I believe this should be presumed to be a personal use of campaign funds. The Committee should explain what this organization is and what the money is being used for. Documentation should be demanded and verified.

The PDC should investigate the possibility that King County Working Families PAC 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

De'Sean Quinn stands up for us.

Tukwila Mayor De'Sean Quinn has a **proven track record** of promoting our local economy.

He will incentivize small businesses to **bring living wage jobs** to Tukwila.



VOTE

BY TUESDAY, NOVEMBER 3

De'Sean Quinn

FOR MAYOR

www.PeopleforDeSeanQuinn.com

Vendor	Date	Amount	Description	Failure to breakdown expenditures
MOXIE MEDIA INC.	2015-10-19	\$ 32,475.00	CAPITOL CITY PRESS: DIRECT MAIL PRODUCTION SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEAT	Failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
CHISM STRATEGIES	2015-10-20	\$ 8,000.00	TELEPHONING SUPPORING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL AND DESEAN QUINN	Failure to identify the date when telephoning occurred, the actual vendor that did the telephoning, and failure to breakdown what amount of telephoning was done on behalf of each candidate.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
DSPOLITICAL	2015-10-20	\$ 7,417.93	INTERNET ADS SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL AND DESEAN QUI	Failure to identify subvendor who was actually paid for the advertisements, failure to identify dates of broadcast, failure to identify outlets, and failure to breakdown amounts attributed to support of each candidate.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
MOXIE MEDIA INC.	2015-10-24	\$ 3,143.00	MAIL PRODUCTION SUPPORTING DESEN QUINN TUKWILA MAYOR	Failure to identify vendor, failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
JR MAILING SERVICE	2015-10-20	\$ 2,858.16	POSTAGE/MAILING SERVICE	Failure to identify the candidate being supported, failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
JR MAILING SERVICE	2015-10-21	\$ 2,561.55	POSTAGE/MAILING SERVICE	Failure to identify the candidate being supported, failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
MOXIE MEDIA INC.	2015-10-24	\$ 2,000.00	DIGITAL ADS SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL	Failure to identify subvendor who was actually paid for the advertisements, failure to identify dates of broadcast, failure to identify outlets, and failure to breakdown amounts attributed to support of each candidate.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
MOXIE MEDIA INC.	2015-10-24	\$ 1,750.00	DIGITAL ADS SUPPORTING DESEAN QUINN FOR TUKWILA MAYOR	Failure to identify subvendor who was actually paid for the advertisements, failure to identify dates of broadcast, and failure to identify outlets.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
JR MAILING SERVICE	2015-10-12	\$ 1,630.02	POSTAGE/MAILING SERVICE	Failure to identify the candidate being supported, failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
JR MAILING SERVICE	2015-10-19	\$ 1,361.55	POSTAGE/MAILING SERVICE	Failure to identify the candidate being supported, failure to identify the date when mail piece was distributed.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
JR MAILING SERVICE	2015-10-23	\$ 885.67	POSTAGE/MAILING SERVICE	Failure to identify the candidate being supported, failure to identify the date when mail piece was distributed.
MOXIE MEDIA INC.	2015-10-24	\$ 500.00	WEBSITE SUPPORTING DESEAN QUINN TUKWILA CITY COUNCIL	Failure to identify subvendors.

Vendor	Date	Amount	Description	Failure to breakdown expenditures
MOXIE MEDIA INC.	2015-10-24	\$ 500.00	WEBSITE SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL	Failure to identify subvendors, failure to identify amount of expenditure attributed to support of each candidate.

2015

Vendor	Date	Amount	Description	Late Debt Reporting
MOXIE MEDIA INC.	2015-10-19	\$ 32,475.00	CAPITOL CITY PRESS: DIRECT MAIL PRODUCTION SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEAT	This should have been reported as debt on 21-day pre-general C4.
CHISM STRATEGIES	2015-10-20	\$ 8,000.00	TELEPHONING SUPPORING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL AND DESEAN QUINN	This should have been reported as debt on 21-day pre-general C4.
DSPOLITICAL	2015-10-20	\$ 7,417.93	INTERNET ADS SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL AND DESEAN QUI	This should have been reported as debt on 21-day pre-general C4.
MOXIE MEDIA INC.	2015-10-24	\$ 3,143.00	MAIL PRODUCTION SUPPORTING DESESN QUINN TUKWILA MAYOR	This should have been reported as debt on 21-day pre-general C4.

Vendor	Date	Amount	Description	Late Debt Reporting
JR MAILING SERVICE	2015-10-20	\$ 2,858.16	POSTAGE/MAILING SERVICE	This should have been reported as debt on 21-day pre-general C4.
JR MAILING SERVICE	2015-10-21	\$ 2,561.55	POSTAGE/MAILING SERVICE	This should have been reported as debt on 21-day pre-general C4.
PROJECT ACCOUNTING SERVICES	2015-11-09	\$ 2,107.00	ACCOUNTING/COMPLIANCE	This should have been accurately reported as debt on 7-day pre-general C4. The estimate that was provided was grossly inaccurate.

Vendor	Date	Amount	Description	Late Debt Reporting
MOXIE MEDIA INC.	2015-10-24	\$ 2,000.00	DIGITAL ADS SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL	This should have been reported as debt on 21-day pre-general C4.
MOXIE MEDIA INC.	2015-10-24	\$ 1,750.00	DIGITAL ADS SUPPORTING DESEAN QUINN FOR TUKWILA MAYOR	This should have been reported as debt on 21-day pre-general C4.
JR MAILING SERVICE	2015-10-19	\$ 1,361.55	POSTAGE/MAILING SERVICE	This should have been reported as debt on 21-day pre-general C4.
JR MAILING SERVICE	2015-10-23	\$ 885.67	POSTAGE/MAILING SERVICE	This should have been reported as debt on 21-day pre-general C4.

Vendor	Date	Amount	Description	Late Debt Reporting
SEATTLE CFO LLC	2016-01-29	\$ 737.50	ACCOUNTING/COMPLIANCE	This should have been accurately reported as debt on 7-day pre-general C4. The estimate that was provided was grossly inaccurate.
MOXIE MEDIA INC.	2015-10-24	\$ 500.00	WEBSITE SUPPORTING DESEAN QUINN TUKWILA CITY COUNCIL	This should have been reported as debt on 21-day pre-general C4.
MOXIE MEDIA INC.	2015-10-24	\$ 500.00	WEBSITE SUPPORTING MIA GREGERSON AND SALLY ANDREWS SEATAC CITY COUNCIL	This should have been reported as debt on 21-day pre-general C4.

Vendor	Date	Amount	Description	Late Debt Reporting
PROJECT ACCOUNTING SERVICES	2015-10-19	\$ 412.50	ACCOUNTING/COMPLIANCE	This should have been reported as debt on 21-day pre-general C4.
PROJECT ACCOUNTING SERVICES	2015-11-30	\$ 375.00	ACCOUNTING/COMPLIANCE	This should have been accurately reported as debt on 7-day pre-general C4. The estimate that was provided was grossly inaccurate.

Vendor	Date	Amount	Description	Late Debt Reporting
PROJECT ACCOUNTING SERVICES	2015-11-30	\$ 66.20	BANKING SUPPLIES	This should have been accurately reported as debt on 7-day pre-general C4. The estimate that was provided was grossly inaccurate.
2016				
SEATTLE CFO LLC	2016-10-31	\$ 2,642.93	ACCOUNTING/COMPLIANCE	This should have been reported as debt on C4 covering the month of September, 2016.

Vendor	Date	Amount	Description	Late Debt Reporting
SEATTLE CFO LLC	2016-07-06	\$ 500.00	ACCOUNTING/COMPLIANCE	This should have been reported as debt on C4 covering the month of September, 2016.
SEATTLE CFO LLC	2016-03-31	\$ 500.00	ACCOUNTING/COMPLIANCE	This should have been reported as debt on C4 covering the month of September, 2016.