

Respondent Name

Washington Against Discrimination Everywhere (WADE) PAC

Complainant Name

Glen Morgan

Complaint Description

[Glen Morgan](#) reported via the portal

(Thu, 7 Sep 2023 at 11:29 AM)

To whom it may concern,

I was up early this morning doing some fence repair on the back property line, and it dawned on me (roughly about the time the sun was rising over Mt. Rainier) that I missed a few additional violations of Washington's campaign finance laws (**RCW 42.17A**) committed by the Washington Against Discrimination Everywhere (WADE) PAC that I both failed to include in the complaint I filed last night and somehow didn't catch in my first review of this serial violator crew. I will correct my oversight from last night this morning – the rest of the fence repair will just have to wait until I unburden myself of these details:

(Please note, since it was only a few hours ago that I filed this complaint, I would anticipate this document I am producing for the PDC is a supplementary file to the complaint I recently filed, so in the interest of keeping the details and allegations organized and the naming convention logical, I will start the first allegation in this supplement numbered right where I left off last night (or actually pretty early this morning, technically))

10) Likely failure to report contributions and/or expenditures associated with ActBlue, possible concealment of large volumes of financial transactions (Violation of RCW 42.17A.235, RCW 42.17A.240)

I noticed this last night when I was drafting the primary complaint, but I must have been distracted and failed to include this important and critical allegation in the original complaint. On page 183 of the records request I received yesterday (included as an exhibit and attached for staff reference) the former treasurer for WADE PAC stated:

“On April 20, 2021, I sent an email to ActBlue to inform them I was no longer with WADE and transfer the account credentials to Jesse. Act Blue responded to my request on the same day, informing me that they removed my name from the account and transferred the account credentials to Jesse.”

This statement from the former treasurer suggests the existence of an ActBlue account and the fact that this shady PAC used this ActBlue account to accept campaign contributions via digital means (debit/credit cards, etc). When a donation is received, a percentage of that donation must then be reported as an expenditure to ActBlue. However, it appears that this PAC has not reported any unitemized expenditures whatsoever and no itemized expenditures to ActBlue, if the PAC accepted even a single test contribution through ActBlue (which they likely did) there would at least be one expenditure to ActBlue. This suggests that there may have been unreported contributions and/or expenditures, although we can only read the tea leaves left behind by this shady crew as they try to conceal their actions.

I will point out that it is possible funds were siphoned from unwary donors using the ActBlue portal where donors would believe they were donating to this PAC, but in reality those funds were stolen, misappropriated or vanished into some other project behind the scenes and at an even shadier, more secret place than this PAC was operating.

It might be necessary to file subpoenas (**See RCW 42.17A.160**) on ActBlue or certainly request a deposition of the former treasurer to get to the bottom of this. I realize that past treasurer is understandably trying to distance himself from this whole thing, but he should come clean and share the truth about this ActBlue relationship and the transactions that appear to have been concealed from the public in this case.

11) Failure to update the C1PC organizing document to include initiatives sponsored or supported by this PAC (Violation of RCW 42.17A.205(2)(g))

I noticed on page 165 of the recent records request I received (and I've attached the entire document here as an exhibit for staff reference), PDC staff noted:

“On March 5, 2021, staff sent an email to attorney Myricks noting: “In your response, you noted WADE (the Committee) activities include support only initiative 1300 (I-1300). However, both the 2020 and 2021 registrations currently on file with

the PDC list the Committee supporting I-1776. Also, the 2020 Committee reported a deficit on its final C-4 for the 2020 election year. However, this deficit was not carried over and no reports were filed for 2021." In the email, staff also requested attorney Myricks to have his client, Jesse Wineberry, and WADE update the Committee's registration and financial data to reflect the supported initiative and also to reflect the status of its financial obligations, including debts owed [Exhibit H].

On April 20, 2021, staff sent an email follow up to the email sent on March 5, 2021, asking the WADE to amend its committee registration and file a C-4 report to carry forward the debt owed from 2020 to 2021."

However, despite this very clear communication by PDC staff to this shady PAC crew, it still appears (after years of notice) that this PAC's registration appears to still not have been updated to reflect honestly the actual initiatives sponsored (the registration only indicates that I-1776 was supported by the committee, making no mention of I-1300).

I point this out in addition to helping this PAC finally correct its illegal and wayward actions, but also so that when this PAC finally fixes this defective C1PC filing that they make all the corrections. My complaint last night indicated the obvious problems with fake officers listed here and falsely claiming a treasurer that hadn't been associated with this PAC for over half a year, but they should also make this specific correction in order to be marginally compliant at the same time (I had attached a copy of the outdated, inaccurate, and currently illegal C1PC filing with my complaint from a few hours ago, so I don't think it is necessary to attach it as an exhibit, but staff can link to it here):

https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=19654

12) Failure to Properly describe Initiative supported in expenditure descriptions (Violation of RCW 42.17A.240(6) or RCW 42.17A.255(5)(b) and WAC 390-16-037)

This is actually a specific violation related to the previous violation described in allegation #11 above.

WAC 390-16-037 requires that: "Any person required to report the 'purpose' of an expenditure under **RCW 42.17A.240(6)**, or **42.17A.255 (5)(b)**, must identify any candidate(s) or ballot proposition(s) that are supported or opposed by the expenditure unless such candidate(s) or ballot proposition(s) have been previously identified in a statement of organization of the person required to be filed **under RCW 42.17A.205 (2)(f) and (g);**"

On page 175 of the PRR (I've attached this document for staff reference as an exhibit), the committee's attorney states that: "**WADE's activities include supporting only Initiative 1300 (I-1300)**". The committee did not include this fact on their statement of organization as I indicated above in Allegation #11. Therefore, any expenditures supporting I-1300 would have to be specifically noted in the expenditure description. However, this was apparently not done by the committee.

13) Failure to properly identify as a sponsored committee (Violation of RCW 42.17A.005(47)(b)(i), WAC 390-16-011A, RCW 42.17A.205)

I don't know why I didn't notice this one last night in my first draft, but obviously when a PAC, even one as apparently screwed up and dishonest as this one receives more than 80% of its contributions from one entity, it must amend its registration to put the sponsor's name in its name as a sponsored committee.

As mentioned earlier in my previous complaint (Allegation #2) the exact date Docusign made the weird, undefined "in-kind" contribution to the campaign is not clear. Multiple conflicting dates have been reported by these guys. However, from the testimony that the committee's "attorney" gave at the January 12, 2023 Brief Adjudicative Proceeding:

https://www.youtube.com/watch?v=kXMgDGVv_0g

It sounds like that specific "in-kind" contribution may have actually been made as early as July 2020 (which is different than they report on their sworn statements to the PDC (See allegation #2 on the complaint I filed last night/this morning). However, whenever it was made, it appears that this contribution would have constituted more than 80% of all the contributions received (or at least disclosed) by this PAC and as such this PAC would also have to amend its C1PC filing to clearly identify Docusign as a sponsor.

Obviously, it is possible we are missing the secretive, concealed, unreported ActBlue contributions which could total enough to deflate the Docusign “in-kind” contribution to below the 80% threshold, but it appears only a subpoena to ActBlue will clarify this situation.

Regardless, this is an important fact to raise now because in addition to correcting their C1PC to remove the fake officers (see Allegation #3), the long resigned treasurer (see Allegation #4), including the initiatives they sponsored (see Allegation #12, above), they would also have to identify as a sponsored committee.

This was obvious to me last night, but I failed to include it in the original complaint draft, for which I apologize for my oversight. I usually don’t miss this specific type of violation, but I caught it fairly quickly, so hopefully it can be included in the initial correspondence with whoever still represents this shady PAC, assuming they haven’t left the country for a warmer climate without extradition treaties.

14) Failure to include “Top 5 Contributor” Statement on website (Violation of RCW 42.17A.320)

Frankly, this PAC was just so shady and violated so many law simultaneously that it is difficult to untangle which overlapping set of violations they committed here, and this clear violation just got lost in the shuffle of trying to figure out what these guys were doing, despite how obvious it is.

If you looked at the website sponsored by WADE PAC as it appeared on September 21, 2020 linked here:

<https://web.archive.org/web/20200921183927/https://yeson1776.com/>

It is very apparent that this website fails to include the names of either the sponsored “in-kind” contribution from Docusign (which at \$25,000 clearly meets the threshold of top 5 contributor), and at least two other donors who donated \$1,000 prior to September 21, 2020 – including the 8/18/2020 contribution from the “Retired Public Employee Council of Washington PAC” and the 7/13/2020 contribution from Dr. Terry Ross – a UW College of the Environment assistant Dean for \$1,000.

(Note: while the threshold for including someone in the Top 5 statement was recently changed to \$2000, it was \$1000 at the time, see link:

(<https://www.pdc.wa.gov/news/2023/new-contribution-limits-and-reporting-thresholds-take-effect-april-1-2023>)

15) Failure to properly disclose reimbursement (Violation of RCW 42.17A.240)

On a C4 report that I’ve attached as an exhibit on my previous complaint a few hours ago (**PDC Report #110003528**) the committee disclosed a \$100 reimbursement to Dr. Lynn French, but the description fails to actually describe what the reimbursement was for or provide the name and address of the actual vendor involved in this expenditure reimbursement.

In the bigger scheme of this conspiracy to conceal the truth from the public by this PAC, this is not the most significant violation, but in the context of everything else, it just seems like this crew can go back and correct all their deficiencies and lawbreaking and at least come clean and tell the truth so the public can know what has actually happened here.

One aspect of this shady PAC and its apparent determination to violate as many aspects of Washington’s campaign finance laws they possibly can is the clear evidence that this was and remains a very experienced group of people who clearly should have known better and yet they chose to violate the law regardless.

At the top of this list, of course is Jesse Wineberry, who has a long history of running for office, being elected to office and filing campaign finance reports. He understands and knows the law very well with decades of experience – even if much of that is experience breaking the law. He has no excuse for this behavior, yet he seems to have run off with the ActBlue account with zero accountability.

The treasurer used for a time at this PAC was CPA, professional, and clearly capable of reading and following the law. He is and was a professional, clearly capable of doing the right thing, or at least literate enough to read the law and file reports that were accurate and timely. He did not.

However, worse than this assembly of violators is this guy, Mr. Myricks who claims to be an attorney, yet despite his professional credentials as a legal professional and officer of the court, he is clearly knee deep (or at least up to his shoulders) mired down in illegal activity. He is clearly capable of reading the law, just like the rest of us, and yet he has been highly engaged in violating it – willfully and with knowledge. Lawbreakers, even if they claim to be attorneys should be held to a higher standard, not an impossible standard, just a marginally capable standard of following the law. Plenty of less educated, less credentialed and less knowledgeable people are capable of following the law and do so every day. What is so wrong with this group that they seem incapable of doing the same? It is a mystery that may never be solved.

However, while we can't turn dishonest people into honest folk overnight, we can get them to file their documents correctly and comply with Washington State's campaign finance laws. Hopefully, this supplemental complaint combined with the one I filed a few hours ago can help in this long road back to the light for these guys.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know what happened with this crew, this weird and shady PAC, how they spent their cash, who funded them, some idea of what initiatives they supported, who their prime sponsor was, who their top 5 donors were, and just what the heck a bunch of experienced people were doing failing to even come close to following the law. At some point, even groups that choose to violate the law need to come into compliance whether they want to do so or not.

List of attached evidence or contact information where evidence may be found

Some of the referenced documents were provided in the previous complaint, and I've attached two supplemental exhibits were new.

List of potential witnesses with contact information to reach them

Everyone involved, although it looks like their contacts and interaction with the PDC only dig the hole deeper. I'm sorry I didn't include these specific violations are part of the original complaint I filed last night (early in the am). However, this supplemental complaint should round out the most obvious of the major violations here.

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Myricks Law Group

replied

2 years ago (Mon, 22 Feb 2021 at 6:42 PM)

To: "'PDC Support'" <pdcc@pdcc.wa.gov>

Dear Mr. Lavallee and Ms. Fiman:

The following are the responses to the allegations raised in the complaint filed by Mr. Kan Qiu:

1) COMPLAINANT: Alleges that Respondent WADE has violated RCW [42.17A.240](#) (6) which states,

"Each report required under RCW [42.17A.235](#) (1) through (4) must be certified as correct by the treasurer and the candidate and shall disclose the following, except an incidental committee only must disclose and certify as correct the information required under subsections (2)(d) and (7) of this section:

(6) The name and address of each candidate or political committee to which any transfer of funds was made, including the amounts and dates of the transfers;"

RESPONDENT: WADE has not violated RCW [42.17A.240](#) (6) because WADE has not made any transfer of funds to a candidate or a political committee. Therefore, WADE is not required by the PDC to report the name, address, amounts and dates of fund transfers which never transpired.

2) COMPLAINANT: Washington Against Discrimination Everywhere has failed to report the support and services it received for websites yeson1234.com and yeson1300.com, and I-1234 and I-1300 petitions design and printing cost.

RESPONDENT: RCW [42.17A.240](#) (7) requires a committee to report the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and purpose of each expenditure, and the total sum of all expenditures.

Respondent's expenditures did not exceed the statutory \$50.00 aggregate reporting requirement. The purchase price of the yeson1234.com and yeson1300.com domains were \$1.00 each for the entire 2020-2021 calendar year. The I-1234 and I-1300 petitions were simple revisions of an existing petition, which cost a \$9.00 pizza for the volunteers who revised the petition.

Finally, there were no major printing costs this year due to the COVID-19 pandemic which required supporters to simply print their own petitions from our website and sign their names, as you can see and still do right here: [Sign Your Name! | I1300MANUELELLIS](#).

The following are the responses to the questions posed by Ms. Tabatha Blacksmith in the email message dated December 28, 2020:

The C-1PC report filed by WADE on 6/18/20 states that the committee supports “#1776 Washington Anti-Discrimination Act.” However, based on the most recent complaint, and a review of the website yeson1300.com (which redirects to i1300manuelellis.com), WADE also appears to be supporting another initiative: I-300, the Manuel Ellis Washington Anti-Discrimination Act (WADA). The above-mentioned website says it was paid for by “Washingtonians Against Discrimination Everywhere.” As you can see, the committee name identified as the website’s sponsor is slightly different than the name under which WADE registered with the PDC.

ANSWERS ARE BELOW IN **BLUE** TEXT:

- Does WADE’s activities include supporting I-300? **NO. Washingtonians Against Discrimination Everywhere’s (WADE) activities DO NOT include supporting I-300. WADE’s activities include supporting only Initiative 1300 (I-1300). If so, will these activities continue in 2021? NO. The I-1300 campaign has ended.**
- Is the above-mentioned website sponsored (paid for) by WADE or is there a second, unregistered committee with a similar name? **YESON1300.com is sponsored by WADE. However, to date no funds have been paid for this website.**
- If the website belongs to WADE, why does the disclosure (sponsor identification) on its home page identify the committee as “Washingtonians Against Discrimination Everywhere” instead of its registered name? **Washingtonians Against Discrimination Everywhere (WADE) is the committee’s correct name. “Washington Against Discrimination Everywhere” contains a minor typo in the spelling of the word, Washingtonians.**
- The evidence provided for case 82263 includes a photo of a stack of paper petitions for I-300. **As stated above, Washingtonians Against Discrimination Everywhere’s (WADE) activities DO NOT include supporting I-300.**
- Did WADE purchase the paper petitions or receive them as an in-kind contribution? If so, what day was the expenditure made or in-kind contribution received? **WADE neither purchased the petitions in the photo nor received them as an in-kind contribution. Members of the Manuel Ellis family made those petitions available to members of the press at a press conference convened by the Manuel Ellis family, not WADE.**

Regards,

--

Toussaint L. Myricks, Esq.

Law Offices of Toussaint L. Myricks, PLLC

P.O. Box 1358

Renton, WA 98057

tel: (425) 572-5187

Exhibit F
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cel: (206) 701-4737
fax: (206) 922-5628

LinkedIn: <https://www.linkedin.com/in/tmyricks/>

E-MAIL CONFIDENTIALITY NOTICE

This communication and any files or documents transmitted herewith are confidential and privileged. They are intended for the sole use of the individual or entity to which it is addressed. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon the communication is strictly prohibited. Moreover, any such inadvertent disclosure shall not compromise or waive the attorney-client privilege as to this communication or otherwise. If you have received this communication in error, please delete it and notify me immediately by email at myricks@myrickslaw.com.



State of Washington
PUBLIC DISCLOSURE COMMISSION

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Memorandum

To: Public Disclosure Commission

From: Erick O. Agina, Compliance Officer

Date: December 30, 2022

Subject: Enforcement Hearing Memorandum: PDC Case #82263 – Jesse Wineberry & Washington Against Discrimination Everywhere (WADE)

Allegation(s):

The Public Disclosure Commission (PDC) staff alleges that Jesse Wineberry, as the principal organizer of Washington Against Discrimination Everywhere (WADE) political action committee, failed to timely file two Summary, Full Report Receipts and Expenditures (C-4) reports for election years 2021 and 2022, disclosing \$25,000 debt owed to DocuSign as carry forward from the 2020 election year, as required for committees registered under the “Full Reporting” option.

Background:

- WADE was a political action committee that supported Initiative Measure No. 1776, a statewide ballot measure/proposition in the 2020 election year.
- On June 18, 2020, WADE filed a Committee Registration (C-1pc) report as a “Continuing” committee and listed Dr. Terry Ross, Dr. Lynn French and Amanuel Mamo, and Abdirahman Mohamud, CPA as Main Sponsor, Co-Sponsors and Treasurer, respectively. **[Exhibit A]**.
- On December 20, 2020, PDC staff received a complaint filed by Kan Qiu alleging that WADE and its committee officers failed to report expenditures made in support of a ballot proposition. Specifically, Mr. Qiu’s complaint alleged that WADE and its officers violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary, Full Report Receipts and Expenditures (C-4) reports, disclosing expenditures undertaken by the Campaign for website design and printing costs, as required for a committee registered under the “Full Reporting” option during the 2020 election cycle **[Exhibit B]**.

- PDC staff sent notice of the complaint to WADE on December 23, 2020, and requested a response to the complaint by January 6, 2021 **[Exhibit C]**.
- On January 13, 2021, staff sent a follow up email to WADE regarding the status of the response to the complaint, which was due no later than January 6, 2021.
- On January 28, 2021, staff called and left a voicemail for the committee's treasurer, Abdirahman Mohamud, requesting a call back regarding the status of the committee's response. On the same day, Abdirahman Mohamud called staff back and noted that the committee's email contact jcwceo@gmail.com for Jesse Wineberry, was the correct contact for the committee's report.
- On the same day, January 28, 2021, staff contacted Jesse Wineberry via email noting that staff was provided information from the WADE treasurer that Jesse Wineberry would be the respondent in this matter/complaint **[Exhibit D]**.
- On February 22, 2021, staff sent a Notice of Initial Hearing (Case Status Review) to WADE and Jesse Wineberry via electronic mail **[Exhibit E]**.
- On February 22, 2021, staff received a response to the complaint from attorney Toussaint L. Myricks, who is representing Jesse Wineberry and WADE in this matter **[Exhibit F]**.
- On February 23, 2021, staff sent the Initial Hearing Results for the Initial Hearing/Case Status Review to Jesse Wineberry and his attorney Toussaint Myricks, after opening a formal investigation **[Exhibit G]**.
- On March 5, 2021, staff sent an email to attorney Myricks noting: "In your response, you noted WADE (the Committee) activities include support only initiative 1300 (I-1300). However, both the 2020 and 2021 registrations currently on file with the PDC list the Committee supporting I-1776. Also, the 2020 Committee reported a deficit on its final C-4 for the 2020 election year. However, this deficit was not carried over and no reports were filed for 2021." In the email, staff also requested attorney Myricks to have his client, Jesse Wineberry, and WADE update the Committee's registration and financial data to reflect the supported initiative and also to reflect the status of its financial obligations, including debts owed **[Exhibit H]**.
- On April 20, 2021, staff sent an email follow up to the email sent on March 5, 2021, asking the WADE to amend its committee registration and file a C-4 report to carry forward the debt owed from 2020 to 2021.
- On June 14, 2021, staff again sent an email to attorney Myricks and Jesse Wineberry with follow up questions, specifically, asking about the outstanding \$25,000 debt owed to DocuSign **[Exhibit I]**.
- On December 1, 2021, staff received an email response to the complaint from Lynn French, who is one of the co-sponsors listed on the Committee's registration (C-1pc), stating that he has never been a member of WADE **[Exhibit J]**.

- On December 2, 2021, staff received an email response to the complaint from Abdirahman Mohamud, Treasurer, noting that he was simply hired to record monthly transactions and report to the PDC...noting that he spoke to Mr. Jesse Wineberry “several times regarding this issue and he assured me that it will be taken care of” **[Exhibit K]**.
- On April 22, 2022, staff sent a letter from the PDC general counsel, Sean Flynn, to attorney Myricks and Jesse Wineberry via email **[Exhibit L]**.
- On May 23, 2022, staff received a response (#2) to questions previously posed by staff. In the response, Mr. Wineberry, through his attorney, Toussaint Myricks, acknowledged that the \$25,000 debt owed to DocuSign was still outstanding **[Exhibit M]**.
- On June 22, 2022, staff sent a follow-up email in response to the Respondent’s second response received on May 23, 2022. In the response, staff stated: “Per your response, you note the campaign has ended and the bank account has closed, however there remains a debt. Until the debt is cleared, the campaign has not ended and there continues to be a continuing reporting requirement to the PDC.” Staff also talked to attorney Myricks via telephone on July 14, 2022, and forwarded the June 22, 2022, email and attached a copy of the C-4 report filed on December 11, 2020, depicting a \$25,000 debt owed to DocuSign **[Exhibit N]**.
- On September 13, 2022, staff received an email from attorney Myricks stating that his client, Jesse Wineberry, was in ongoing negotiations with DocuSign regarding the \$25,000 debt...noting that “As you know, my client has fully complied with the PDC’s rules which require the disclosure of the debt. My client will continue reporting the debt until the debt is retired” **[Exhibit O]**.
- On September 27, 2022, staff sent an email follow-up to attorney Myricks asking him to let staff know once his client files the C-4 reports for 2021 and 2022 depicting the carry-forward debt of \$25,000 owed to DocuSign **[Exhibit P]**.
- On November 23, 2022, staff sent another follow-up email to attorney Myricks requesting his client file the two C-4 reports for 2021 and 2022, depicting the \$25,000 debt owed to DocuSign as carry-forward debt **[Exhibit Q]**.
- On December 14, 2022, staff served attorney Myricks and his client, Jesse Wineberry, by electronic mail, with a Hearing Notice for a Brief Adjudicative Proceeding (Brief Enforcement Hearing) to be held on Thursday, January 12, 2023, concerning the alleged violation of RCW 42.17A.235 and .240 for failure to timely file two Summary, Full Report Receipts and Expenditures (C-4) reports, disclosing the \$25,000 debt owed to DocuSign in 2021 and 2022. Staff sent an updated Notice to attorney Myrick via electronic mail on January 2, 2023, to correct an incorrect name that was inadvertently included in the second paragraph of the initial Notice of Brief Enforcement Hearing sent to Attorney Myricks and Jesse Wineberry on December 14, 2022 **[Exhibit R]**.

Laws & Rules:

RCW 42.17A.235 and **RCW 42.17A.240** require committees to file timely, accurate reports of contributions and expenditures. Under the “Full Reporting” option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions exceed \$200 since the last report; on the twenty-first day and the seventh day preceding the date of the primary and general election date(s); and on the tenth day of the first month after the primary and general election date(s). For debt owed at the end of the campaign cycle or election year/cycle, an obligation to file with the PDC remains until the debt is paid in full and a final report filed depicting the debt has paid in full or forgiven.

Exhibit List:

- **Exhibit A** – Committee Registration (C-1pc) report – WADE; filed June 18, 2020.
- **Exhibit B** – Complaint, PDC Case 82263 – WADE; filed December 20, 2020.
- **Exhibit C** – Notice of Complaint Email from Staff to WADE/Attorney Myricks
- **Exhibit D** – Email to Jesse Wineberry notifying him that he has been identified as the Respondent in this case/matter.
- **Exhibit E** – Notice of Initial Hearing (Case Status Review to WADE/Jesse Wineberry – PDC Case 82263
- **Exhibit F** – Complaint Response (#1) from Attorney Myricks on behalf of Jesse Wineberry – PDC Case 82263.
- **Exhibit G** – Initial Hearing Results after Opening a Formal Investigation – Case 82263.
- **Exhibit H** – PDC staff Email in response to the Complaint Response (#1) with follow up questions from staff – PDC Case 82263.
- **Exhibit I** – Email (June 14, 2021) follow up from staff to attorney Myricks and Jesse Wineberry regarding the \$25,000 debt owed to DocuSign – PDC Case 82263.
- **Exhibit J** – Response to the complaint from Lynn French, Co-Sponsor listed on the C-1pc – PDC Case 82263.
- **Exhibit K** – Response to the complaint from Abdirahman Mohamud, Treasurer listed on the C-1pc – PDC Case 82263.
- **Exhibit L** – Letter from PDC General Counsel to Attorney Myricks and Jesse Wineberry – PDC Case 82263.
- **Exhibit M** – Complaint Response (#2) from Attorney Myricks on behalf of Jesse Wineberry – PDC Case 82263.
- **Exhibit N** – PDC staff email (June 22, 2022) to Attorney Myricks in response to Complaint Response (#2) with follow up questions – PDC Case 82263.
- **Exhibit O** – Email from Attorney Myricks to staff regarding the status of the \$25,000 debt owed to DocuSign – PDC Case 82263
- **Exhibit P** – Email (Sept. 27, 2022) from staff to Attorney Myricks – PDC Case 82263.
- **Exhibit Q** – Email (Nov. 23, 2022) from staff to Attorney Myricks – PDC Case 82263
- **Exhibit R** – Notice of Brief Adjudicative Proceeding (Brief Enforcement Hearing) sent to Attorney Myricks and Jesse Wineberry – PDC Case 82263.



Washington Against Discrimination Everywhere (WADE)

P O Box 604
Renton, WA 98057
abdi@garabeyfinancial.com

Registration Filed

Pac
Full Reporting
Submitted date: 06/18/2020
Certified by abdi@garabeyfinancial.com
Continuing
WASHI-057

Bank Information

BeCu
12770 Gateway Drive South
Tukwila, WA 98168
To schedule books review contact abdi@garabeyfinancial.com

Officers

Dr. Terryl Ross

Main Sponsor
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Dr. Lynn French

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Ballot Propositions

Supporting #1776