



STATE OF WASHINGTON

**PUBLIC DISCLOSURE COMMISSION**

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TO: Commissioners

FROM: Philip E. Stutzman, Director of Compliance

DATE: November 25, 2014

SUBJECT: Lucy DeYoung, Case No. 14-008

This case involves alleged violations by Lucy DeYoung for failing to timely file C-6 reports of Electioneering Communications and Independent Expenditure Political Advertising for more than \$14,000 worth of direct mail and advocacy phone calls opposing one candidate for Woodinville City Council in the November 5, 2013 general election. This case also involves alleged violations by Ms. DeYoung for failing to include her name and the required sponsor identification for the Independent Expenditure Political Advertising, and for concealing her identity as the source of the more than \$14,000 expenditures for the Electioneering Communications and Independent Expenditure Political Advertising by using the pseudonym “Ethical Woodinville.”

You are being provided the Notice of Administrative Charges and Report of Investigation. Staff is working with the Respondent to jointly present a Stipulation of Facts, Violations and Penalty for Commission consideration that will accurately describe the nature of the alleged violations, the relevant facts, and an appropriate penalty.



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of Enforcement  
Action Against

Lucy DeYoung

Respondent.

PDC Case No. 14-008

Notice of Administrative Charges

**I. Jurisdiction**

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

**II. Allegations**

2. Staff alleges that Lucy DeYoung violated RCW 42.17A as follows:
  - A. RCW 42.17A.255 by failing to timely file a C-6 report of Independent Expenditures disclosing approximately \$2,905 for a postcard presented to the public on August 29, 2013 opposing Bernie Talmas, a Woodinville City Council candidate, running for re-election in the November 5, 2013 general election. The Independent Expenditure Political Advertising has not been reported.
  - B. RCW 42.17A.255 by failing to timely file a C-6 report of Independent Expenditures disclosing \$298 for advocacy phone calls opposing Mr. Talmas that were presented to the public on October 21, 2013 at a cost of \$298. A C-6 report of Independent Expenditures was filed 105 days late, by facsimile.
  - C. RCW 42.17A.305 by failing to timely file a C-6 report of Electioneering Communications disclosing \$11,740 for direct mail postcards opposing Mr. Talmas.

Four direct mail postcards were presented to the public on September 9, 2013, September 23, 2013, October 7, 2013, and October 18, 2013, each costing \$2,935.05 for a total cost of \$11,740, and were filed 150, 136, 122, and 109 days late, by facsimile.

- D. RCW 42.17A.320 by using the assumed name “Ethical Woodinville” as the sponsor of Independent Expenditure Political Advertising and failing to include the name of the actual sponsor, Lucy DeYoung, and the required language, "No candidate authorized this ad. It is paid for by (name, address, city, state).”
- E. RCW 42.17A.435 by concealing her identity as the source of the Electioneering Communications and Independent Expenditure Political Advertising totaling expenditures of approximately \$14,973 for direct mail and advocacy phone calls opposing Mr. Talmas.

### **III. Facts**

- 3. On March 28, 2013, Bernie Talmas filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to the Woodinville City Council in 2013. Mr. Talmas served as Mayor of Woodinville during 2013.
- 4. At the July 16, 2013 Woodinville City Council meeting, the council discussed amending the language about the removal of the Mayor and Deputy Mayor in the Council’s “Rules of Procedure” in Resolution No. 436. The council also discussed amending the Council’s “Code of Ethics” to add language for a censure process in the Rules of Procedure for a violation of General Decorum.

#### **Direct Mail Postcards and Advocacy Calls**

- 5. Between August 29, 2013 and October 21, 2013, Lucy DeYoung sponsored Independent Expenditure Political Advertising and Electioneering Communications that cost approximately \$14,973 for direct mail postcards and advocacy phone calls opposing Bernie Talmas, a Woodinville City Council candidate, running for re-election in the November 5, 2013 general election. Five direct mail postcards were presented to the

public on August 29, 2013, September 9, 2013, September 23, 2013, October 7, 2013, and October 18, 2013, each costing approximately \$2,935.05. Advocacy phone calls were presented to the public on October 21, 2013 at a cost of \$298.

6. A C-6 report of Independent Expenditures was required to be filed by October 28, 2013 for the advocacy phone calls, but was not reported until February 7, 2014, 105 days late, by facsimile. The C-6 report was refiled electronically on March 4, 2014.
7. Four direct mail postcards were presented to the public on September 9, 2013, September 23, 2013, October 7, 2013, and October 18, 2013, each costing \$2,935.05 for a total cost of \$11,740, and were required to be reported on September 10, September 24, October 8, and October 21, 2013. They were reported 109 to 150 days late on February 7, 2014, by facsimile. A C-6 report for these four expenditures was refiled electronically on March 4, 2014.
8. A direct mail postcard was presented to the public on August 29, 2013 opposing Mr. Talmas. A C-6 report of Independent Expenditure Political Advertising disclosing approximately \$2,905 in expenditures was required to be reported on a C-6 report by September 3, 2013, but has not been reported.
9. The direct mail postcards attacked the character and campaign tactics of Mr. Talmas, making the ads subject to only one reasonable interpretation: an exhortation to vote against Mr. Talmas. They were presented to public within 60 days of an election and, in aggregate, cost more than \$1,000.

#### **Sponsor Identification for Postcards/Telephone Calls**

10. None of Ms. DeYoung's electioneering communication postcards, her independent expenditure political advertising postcard, or her independent expenditure political advertising telephone calls included a statement of sponsor identification taking the form, "No candidate authorized this ad. It is paid for by (name, address, city, state)." Rather, the postcards identified Ethical Woodinville with a web address and a rented UPS mailing address. The telephone calls identified Ethical Woodinville with a web address

and telephone number. None of the communications identified Ms. DeYoung as their sponsor.

### **Concealment of Expenditures for Direct Mail and Advocacy Phone Calls**

11. Ethical Woodinville is not a registered political committee nor a separate legal entity of any kind. It is an assumed name, created, funded, and controlled by Lucy DeYoung for the purpose of sponsoring various forms of election related communications. Despite considerable media attention seeking the identity of the person or persons behind Ethical Woodinville in the weeks leading up to the election, Ms. DeYoung failed to identify herself as the sponsor of the communications attributed to Ethical Woodinville.

### **IV. Law**

**RCW 42.17A.005(19)(a)** defines "Electioneering communication" to mean any broadcast, cable, or satellite television or radio transmission, United States postal service mailing, billboard, newspaper, or periodical that: (i) Clearly identifies a candidate for a state, local, or judicial office either by specifically naming the candidate, or identifying the candidate without using the candidate's name; (ii) Is broadcast, transmitted, mailed, erected, distributed, or otherwise published within sixty days before any election for that office in the jurisdiction in which the candidate is seeking election; and (iii) Either alone, or in combination with one or more communications identifying the candidate by the same sponsor during the sixty days before an election, has a fair market value of one thousand dollars or more.

**RCW 42.17A.005(36)** defines "Political advertising" to include any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, or other means of mass communication, used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.

**RCW 42.17.005(26)** states, (26) "Independent expenditure" means an expenditure that has each of the following elements:

- (a) It is made in support of or in opposition to a candidate for office by a person who is not (i) a candidate for that office, (ii) an authorized committee of that candidate for that office, (iii) a person who has received the candidate's encouragement or approval to make the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office, or (iv) a person with whom the candidate has collaborated for the purpose of making the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office;

(b) The expenditure pays in whole or in part for political advertising that either specifically names the candidate supported or opposed, or clearly and beyond any doubt identifies the candidate without using the candidate's name; and

(c) The expenditure, alone or in conjunction with another expenditure or other expenditures of the same person in support of or opposition to that candidate, has a value of \*eight hundred dollars or more.<sup>1</sup> A series of expenditures, each of which is under eight hundred dollars, constitutes one independent expenditure if their cumulative value is eight hundred dollars or more.

**Washington State Supreme Court's ruling in *Washington State Republican Party v. Public Disclosure Commission*, 141 Wn.2d245 (2000) (WSRP).** (Excerpt) The Court further stated, in defining "express" advocacy, that when an ad "is unmistakable and unambiguous in its meaning, and presents a clear plea for the listener to take action to defeat[a] candidate," it is "express" advocacy. *Id.* At 273. The Supreme Court held as "important" that if, in an ad, "a candidate's character and campaign tactics are attacked, the ad may be subject to only one reasonable interpretation: an exhortation to vote against the candidate." *Id.* At 270. In contrast, the Court described "issue" advocacy as advocacy that "intend[s] to inform the public about political issues germane to [an] election." *Id.* At 272. This paragraph is from the meeting materials for the January 26, 2012 Commission Meeting, on page 122 of 312.

**RCW 42.17A.255** states: (1) For the purposes of this section the term "independent expenditure" means any expenditure that is made in support of or in opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.220, 42.17A.235, and 42.17A.240. ... (2) Within five days after the date of making an independent expenditure that by itself or when added to all other such independent expenditures made during the same election campaign by the same person equals one hundred dollars or more, or within five days after the date of making an independent expenditure for which no reasonable estimate of monetary value is practicable, whichever occurs first, the person who made the independent expenditure shall file with the commission an initial report of all independent expenditures made during the campaign prior to and including such date.

**RCW 42.17A.305** requires that the sponsor of an electioneering communication shall report to the commission within twenty-four hours of, or on the first working day after, the date the electioneering communication is broadcast, transmitted, mailed, erected, distributed, or otherwise published, and include: (a) Name and address of the sponsor; (b) Source of funds for the communication, (c) Name and address of the person to whom an electioneering communication related expenditure was made; (d) A detailed description of each expenditure of more than one hundred dollars; (e) The date the expenditure was made and the date the electioneering communication was first broadcast, transmitted, mailed, erected, distributed, or otherwise published; (f) The amount of the expenditure; and (g) The name of each candidate clearly

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<sup>1</sup> Per WAC 390-05-400, in 2013 this dollar amount was set at \$900.

identified in the electioneering communication, the office being sought by each candidate, and the amount of the expenditure attributable to each candidate.

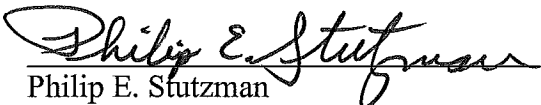
**RCW 42.17A.320** requires (1) All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address. All radio and television political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name. The use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising shall be unlawful. For partisan office, if a candidate has expressed a party or independent preference on the declaration of candidacy, that party or independent designation shall be clearly identified in electioneering communications, independent expenditures, or political advertising.

(2) In addition to the information required by subsection (1) of this section, except as specifically addressed in subsections (4) and (5) of this section, all political advertising undertaken as an independent expenditure or an electioneering communication by a person or entity other than a bona fide political party must include as part of the communication:

(a) The statement: "No candidate authorized this ad. It is paid for by (name, address, city, state)";  
...

**RCW 42.17A.435** states that no contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

RESPECTFULLY SUBMITTED this 25<sup>th</sup> day of November, 2014.

  
Philip E. Stutzman  
Director of Compliance



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17A

Lucy DeYoung/Ethical Woodinville

Respondent.

PDC Case No. 14-008

Report of Investigation

**I.**

**Background**

- 1.1 On March 28, 2013, Bernie Talmas filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to the Woodinville City Council in 2013. Mr. Talmas was elected to the Woodinville City Council in 2009, and served as the Mayor of Woodinville in 2013. **Exhibit #1.**
- 1.2 At the July 16, 2013 Woodinville City Council meeting, the council discussed amending the language about the removal of the Mayor and Deputy Mayor in the Council's "Rules of Procedure" in Resolution No. 436. The council also discussed amending the Council's "Code of Ethics" to add language for a censure process in the Rules of Procedure for a violation of General Decorum. This issue was related to statements made earlier in 2013 by Susan Boundy-Sanders, a Woodinville City Councilmember, about Liz Aspen, also a Woodinville City Councilmember, and Lucy DeYoung, a private citizen.
- 1.3 On October 3, 2013, Susan Boundy-Sanders, an incumbent Woodinville City Councilmember, filed a complaint against Ethical Woodinville alleging failure to register and report as a political committee disclosing contribution and expenditure activities connected with political advertisements or other communications that identified a candidate for Woodinville City Council elections in 2013. **Exhibit #2.**
- 1.4 As part of her complaint, Ms. Boundy-Sanders submitted three postcards that were sponsored by Ethical Woodinville and prominently featured incumbent Woodinville Mayor Bernie Talmas, attacked his character and campaign tactics, and included a message to contact Mayor Talmas and "*...Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct...*"
- 1.5 Ms. Boundy-Sanders supplemented her complaint with Addendum #1 on October 11, 2013, and Addendum #2 on October 23, 2013. The addendums included two additional



postcards produced and distributed by Ethical Woodinville (EW), in addition to the three postcards already provided.

## II.

### Allegations & Results of Investigation

- 2.1 Ms. Boundy-Sanders alleged that EW failed to disclose contributions received and the expenditures made in connection with the postcards, alleged violations of the following:
- A. RCW 42.17A.205 for failing to register as a political committee.
  - B. RCW 42.17A.235 and .240 for failing to report contribution and expenditure activities undertaken by a political committee.
  - C. RCW 42.17A.305 for failing to report electioneering communications on Independent Expenditure or Electioneering Communications reports (C-6 report); and
  - D. RCW 42.17A.320 for failing to include proper sponsor identification on its political advertising.
  - E. RCW 42.17A.435 for concealing the identity of the source of the contribution through the name of another person.
- 2.2 On January 10, 2014, EW/Lucy DeYoung filed five Grass Roots Lobbying reports (L-6 reports) covering the period of August 1 through December 31, 2013, disclosing what Ms. Young described as a grass roots lobbying campaign with the purpose of adopting "Stronger ethical rules for City of Woodinville City Council Conduct." The L-6 report disclosed that Ms. DeYoung was the sole "principal officer" for EW and that she was the only contributor/funder, making two contributions totaling \$20,336.
- 2.3 On February 7, 2014, after conversations with PDC staff, EW filed a C-6 report of Electioneering Communications identifying Lucy DeYoung as the sponsor and sole funder of EW activities, which included creating a website, printing and mailing postcards, and making robo-telephone calls. The C-6 report disclosed that Ms. DeYoung, using personal funds, spent \$11,740 for a series of electioneering communication mailings that identified Bernie Talmas during the 2013 election, and \$297.50 for related telephone calls.
- 2.4 Sponsors of electioneering communications of more than \$1,000 per candidate are required to file C-6 reports within 24 hours of presenting a qualifying communication to the public. The C-6 report submitted by Lucy DeYoung/EW was filed more than four months after the November 5, 2013 general election.

### III. Findings

- 3.1 An "electioneering communication" means any broadcast or United States postal service mailing that: (i) Clearly identifies a candidate for a local office by name (ii) Is broadcast, mailed, distributed, or otherwise published within sixty days before any election for which the candidate is seeking election; and (iii) Alone, or in combination with one or more

communications identifies the candidate by the same sponsor, and has a fair market value of \$1,000 or more.

3.2 During the period August 29 through October 19, 2013, Lucy DeYoung/EW produced and distributed five postcards that featured Woodinville Mayor Bernie Talmas and a candidate for election in 2013.<sup>1</sup> The postcards provided information about Mayor Talmas, attacked his character and campaign tactics, and ended with a “Call Bernie Talmas...” message. Staff’s review found that Lucy DeYoung/EW created a website on August 7, 2013, and also made automated or “robo” calls about Bernie Talmas beginning in the second week of August 2013.

3.3 The election related communications attributed to Ethical Woodinville attracted considerable media attention in the weeks leading up to the November election. There were a number of newspaper articles and Letters to the Editor concerning the activities undertaken by Ethical Woodinville, and the Woodinville election involving Bernie Talmas, that appeared in local newspapers in September and October of 2013. In addition, the complaint provided an email exchange between EthicalWoodinville.com and one of the complainants, Candy Allen, concerning disclosing the sponsors behind Ethical Woodinville and removing her name from the robo-call list (Exhibit #1, pages 20-23). The newspaper articles, included, but were not limited to, the following: **(Exhibit #3)**

- **October 10, 2013, Seattle Times article:** The article included the Headline “Shadowy ads target Woodville mayor, council member” and provided readers with background information and some of the content of the postcard ads attributed to Ethical Woodinville. The article stated the ads called Mayor Bernie Talmas a bully, accused him of using an informant to obtain information about another councilmember, and that the ads “...aren’t sponsored by his election opponent or a registered political action committee, but by a shadowy entity that isn’t saying where it gets it funds....”
- **Several articles and a number of “Letters to the Editor” appeared in the Woodinville Weekly both before and after the 2013 election.** The letters included, but were not limited to, the following:
  1. **October 13, 2013, Woodinville Weekly article:** The article included the Headline “Complaint filed against anonymous political group” and provided readers with information about the complainants, including Susan Boundy-Sanders, and comments she made concerning her complaint against Ethical Woodinville with details about the alleged reporting violations. The article included content from the postcard ads that Ethical Woodinville produced and distributed that “...accuse Mayor Bernie Talmas of bullying and harassing other councilmembers and call him “Peeping Bernie.” Ms. Boundy-Sanders makes a reference to Lucy DeYoung in the article which stated “...DeYoung didn’t respond to requests for an interview.”

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<sup>1</sup> Postcard No. 1 was received by the complainant on August 29, 2013, and presented to the public more than 60 days prior to the November 5, 2013 general election. Therefore, Postcard No. 1 was not reportable by the Respondent as an electioneering communication. However, PDC staff believes Postcard No. 1 is reportable as Independent Expenditure political advertising on a C-6 report.

2. **September 2, 2013, Letter to the Editor in Woodinville Weekly:** The letter to the Editor was from EthicalWoodinville.com and stated that Ethical Woodinville: “is not a political action committee (PAC) as claimed. There has never been, nor will there ever be, any endorsement of any candidates for office...will never ask citizens to vote for or against any candidate. Our mission is stated clearly in every phone call, mailer, or web post that is made public: we ask citizens to call the City Council and urge them to vote for stronger ethics rules for council behavior. The embarrassing antics of Mayor Bernie Talmas and the political operatives and council members who work on his behalf must stop.”
- 3.4 On December 4, 2013, PDC staff sent a letter to EW (since staff was not aware of Ms. DeYoung’s involvement at this time), notifying EW about a complaint that was filed by Ms. Boundy-Sanders, and stating that staff had opened a formal investigation into the complaint.
- 3.5 On December 20, 2013, Phil Stutzman, PDC Director of Compliance, exchanged emails with an anonymous and unidentified representative of EW. The EW representative stated in the email that the complaint letter had just been received, and that EW was requesting additional time to provide a response to the allegations in the complaint.
- 3.6 On January 13, 2014, Mark Lamb, an attorney with the North Creek Law Firm, contacted PDC staff, and stated that he had recently been retained to represent EW in this matter. Mr. Lamb requested additional time to provide a response on behalf of Lucy DeYoung/EW. Mr. Lamb stated that prior to being contacted by the PDC, representatives of EW had communicated with another attorney concerning this matter and had been advised that the postcard mailings were not reportable to the PDC.
- 3.7 Mr. Lamb stated that after the complaint was filed, he was retained as legal counsel, and after reviewing the complaint, reporting requirements and statutes, he suggested that EW file grassroots lobbying (L-6) reports.

#### **Responses from Lucy DeYoung/Ethical Woodinville**

- 3.8 On February 6, 2014, Mr. Lamb sent an email to PDC staff on behalf of Lucy DeYoung/EW in response to the complaint filed by Ms. Boundy-Sanders. Mr. Lamb stated: **Exhibit #4**
  - 3.8.1 Lucy DeYoung created EW in the first half of 2013, and is the sole principal decision-maker and contributor/funder.
  - 3.8.2 Ms. DeYoung’s purpose in creating EW was to support an ordinance in the City of Woodinville to prevent what she perceived as bullying and other types of abusive behavior on behalf of some members of the Woodinville City Council.
  - 3.8.3 EW is not an incorporated entity or registered association.
  - 3.8.4 EW does not have a bank account separate from Ms. DeYoung.
  - 3.8.5 Lucy DeYoung hired Minnick and Minnick, a political consulting firm, to conduct the activities undertaken by EW including mailing postcards, creating a website, and making robo-calls.

- 3.8.6 After Ms. DeYoung consulted with Minnick and Minnick, and prior legal counsel, she stated that she "...believed that EW was the appropriate sponsor of issue advertising postcards..." and that those activities "...were not express advocacy relating to the election and defeat of a candidate."
- 3.8.7 Ms. DeYoung "has no objection to being associated with Ethical Woodinville or the ongoing efforts to pass an ordinance in the City of Woodinville to prevent bullying and abusive behavior on the Woodinville City Council."
- 3.9 On May 19, 2014, PDC staff conducted a telephone interview under oath with Ms. DeYoung, and she was represented by Mr. Lamb, who participated by telephone along with Ms. DeYoung from his Bothell law office. **Exhibit #5.** During the telephone interview under oath, Ms. DeYoung stated:
- 3.9.1 She served as a Woodinville City Councilmember on the initial city council after the incorporation, and served as the initial Mayor of Woodinville. She stated that she was a former member of the WA Public Stadium Authority, and she was also a statewide candidate in 1996 seeking the office of Washington State Treasurer.
- 3.9.2 She was the sole decision-maker for EW and that she made all of the expenditures using her personal funds.
- 3.9.3 All of EW's expenditures were made to Minnick & Minnick except for payments she made to Jeffrey Possinger, a local attorney with whom she consulted in this matter.
- 3.9.4 Mr. Minnick proposed she engage in an "issues campaign" that featured Bernie Talmas, with the content focusing on the alleged "bullying and stalking" of fellow Woodinville council members and citizens.
- 3.9.5 EW produced and mailed five postcards before the election, and mailed one postcard after the election. Mr. Minnick wrote the content for the postcards, and Ms. DeYoung approved the final copy.
- 3.9.6 EW also made Robo-calls with content similar to the postcards, in that the calls ended with a "Contact Bernie Talmas" message concerning the Woodinville City Council adopting an ethics ordinance. She stated that an additional set of Robo-calls were made after the November 2013 general election right before the November 2013 Woodinville City Council meeting that listed the "bullying" issue on the agenda.
- 3.9.7 She wanted to have things done legally, so she recalled having a discussion with Mr. Minnick concerning the sponsor's name that would be listed on the postcards. Ms. DeYoung stated, "...Mr. Minnick assured me that they (meaning the content of the advertisements) would be written so that they would not cross over into a political campaign..."
- 3.9.8 Mr. Minnick informed her that the postcards concerned the Woodinville City Council and attempts to adopt an ordinance related to the "bullying" issue.
- 3.9.9 Mr. Minnick stated the postcard activities were not part of a political campaign, and that the postcards and other EW activities were not reportable to the PDC.
- 3.9.10 She became aware of the PDC reporting requirement for EW activities when she received the complaint letter from PDC staff. She stated that after receiving the

complaint letter, she contacted Mr. Lamb and he advised her to file L-6 reports since he could not find a way for her to file and disclose the “issue advertising” for all of the activities EW was engaged in.

- 3.9.11 She did not meet or have any contact with Bradley Walker, Mr. Talmas’ opponent, concerning the postcards, and that she did not coordinate, consult or communicate with anyone from Mr. Walker’s campaign concerning the EW activities.
- 3.10 Staff reviewed the June 18, 2013, Woodinville City Council agenda, minutes, and video section. The agenda listed a “NEW ITEM: Review of City Council Ethics and Rules of Procedure (No staff report provided)”. The minutes and the video indicated the matter was held over for another meeting, with Mayor Talmas stating on the record “Due to the late hour (10:00 pm), this item was rescheduled to the next Council meeting.”
- 3.11 Staff reviewed the July 16, 2013 Woodinville City Council agenda, minutes, and video section. The agenda listed “Resolution No. 436 Amending the Council Rules of Procedure” concerning language about the removal of the Mayor and Deputy Mayor, along with a “Discussion of Amendments to Code of Ethics.” The minutes and the video indicated both matters were discussed and motions were made and voted on by the council, including: (1) A motion to table Resolution No. 436 concerning language about the removal of the Mayor and Deputy Mayor until January 2014 (passed on a 6-0 vote); and (2) A motion to add language for a censure process in the Rules of Procedure for a violation of General Decorum (passed on a 3-2 vote).

#### **Telephone interview under oath with Chad Minnick**

- 3.12 On August 27, 2014, PDC staff conducted a telephone interview under oath with Chad Minnick. Mr. Minnick was represented by Mr. Lamb in this matter. Mr. Lamb participated by telephone along with Mr. Minnick from Mr. Lamb’s Bothell law office. During the telephone interview under oath, Mr. Minnick stated:
- 3.12.1 He set up his political consulting firm in 1996 and began consulting in 1997. He stated that he has worked with numerous candidates for state, legislative and local office, and several political committee and party organizations (including Dino Rossi and the Washington Association of Realtors).
- 3.12.2 Ms. DeYoung contacted him in late winter/early spring of 2013 about issues concerning the City of Woodinville, and the actions of certain council members which she felt was bullying towards other members of the council and Woodinville citizens.
- 3.12.3 Ms. DeYoung’s goal and objective for EW was to have the Woodinville City Council adopt some type of ethics rules or an ordinance to address the “bullying” behavior, or to adopt or make changes to the Council’s “Rules of behavior.”
- 3.12.4 In order to achieve those goals, he proposed that Ms. DeYoung and EW undertake an “issues campaign” by communicating with the Woodinville community (voters), and inform them about the alleged bullying that was occurring involving some City Council members.

- 3.12.5 The issues campaign intended to encourage the public to send emails or make telephone calls to the Woodinville City Council to try and “put pressure on the council” to come up with some sort of plan to address the bullying issue.
- 3.12.6 He never discussed a budget or specific dollar amount to be spent by Ms. DeYoung, but that they agreed to create an EW website, print and mail a number of postcards featuring Bernie Talmas, and make robo-calls, all funded by Ms. DeYoung.
- 3.12.7 He had discussions with Ms. DeYoung early in the process about the sponsor’s name to be disclosed on the postcards. He understood that EW and Ms. DeYoung sought advice from a local attorney (Jeffrey Possinger) prior to engaging in any activities concerning PDC issues and reporting requirements.
- 3.12.8 He does not advise his clients on PDC related matters. None of the advice concerning EW and whether the mailings were reportable to the PDC came from him. Advice came from Lucy DeYoung/EW’s legal counsel at the time.
- 3.12.9 His understanding was that the postcards and other EW activities were attempting to influence a local policy matter before the Woodinville City Council, and that he did not view EW’s activities as electioneering communications. He stated that he does not understand the concept or definition of an electioneering communication or how an electioneering communication is to be reported.
- 3.12.10 He did not meet or have any contact with Bradley Walker (Bernie Talmas’ opponent in the 2013 Woodinville City Council election) concerning EW’s activities, and he did not coordinate, consult or communicate with anyone connected with Mr. Walker’s campaign.

#### **Ethical Woodinville/Lucy DeYoung files Grass Roots Lobbying reports (L-6 reports)**

- 3.13 On January 10, 2014, EW/Lucy DeYoung filed five Grass Roots Lobbying reports (L-6 reports) covering the period of August 1 through December 31, 2013, and disclosing a campaign with the purpose of adopting “Stronger ethical rules for the City of Woodinville City Council Conduct.” **Exhibit #5.** The L-6 reports filed by EW disclosed:
  - Ms. DeYoung was the only “principal officer” for the entity and the only contributor and funder, making two contributions totaling \$20,336.
  - Ms. DeYoung contracted with Minnick & Minnick, a political consulting firm, and listed them as the organizer or manager for the campaign for EW.
  - EW disclosed making \$20,336 in expenditures to Minnick & Minnick, which included \$13,031 for consulting and public relations; \$6,510 for printing and mailing costs; \$705 for other expenses; and \$90 for office expense, travel, and other expenses.
- 3.14 After being contacted by Mr. Lamb, PDC staff informed Mr. Lamb that L-6 reports are only filed for grassroots lobbying efforts directed at the Washington State Legislature or a Washington State agency concerning the agency’s rulemaking authority, and are not used to disclose local lobbying activities. Staff informed Mr. Lamb that Ms. DeYoung’s mailed

communications were considered electioneering communications, and requested that he advise Ms. DeYoung to file C-6 reports as required.

### **Ethical Woodinville/Lucy DeYoung files C-6 report**

3.15 On February 7, 2014, Lucy DeYoung/EW filed one C-6 report, manually on paper.

**Exhibit #6.** The C-6 report did not indicate whether the report was being filed for independent expenditures, independent expenditure advertising, or electioneering communications by including a “check-mark” in one of the three boxes at the top of the form. The C-6 report disclosed the following:

- Ms. DeYoung made all of the expenditures for electioneering communications using her personal funds.
- One candidate, Bernie Talmas, was identified in the electioneering communications, with \$12,038 in expenditures attributed to his candidacy. The report attributed \$2,935 in expenditures to Susan Boundy-Sanders, an incumbent city councilmember.
- The C-6 report failed to disclose whether the candidates were supported or opposed by the advertisements.
- Minnick & Minnick was the political consultant “organizing or managing the campaign,” and a total of \$12,038 in expenditures were made for four postcard mailings (a total of \$2,935 per mailing), and \$298 was spent for robo-calls.
- The four mailings were all ordered on August 15, 2013, but were presented to the public or mailed on the following dates, which are the dates that trigger the reporting requirement:
  1. September 9, 2013; (C-6 report required on September 10, 2013);
  2. September 23, 2013; (C-6 report required on September 24, 2013);
  3. October 7, 2013; (C-6 report required on October 8, 2013); and
  4. October 18, 2013; (C-6 report required on October 19, 2013).
- According to the C-6 report filed on paper on February 7, 2014, and electronically on March 4, 2014, the robo-calls (\$298 expenditure) were produced on August 3, 2013, and were presented to the public on October 21, 2013.

3.16 Staff contacted Mr. Lamb and informed him that the C-6 report was required to be filed electronically by Lucy DeYoung/EW disclosing the electioneering communications, and that Ms. Boundy-Sanders was not a candidate on the ballot in 2013, and therefore should not be listed on the C-6 report. Staff asked that Ms. Boundy-Sanders’ name be removed from the C-6 report, and that the portion attributed to her be attributed to opposing Mr. Talmas.

3.17 On March 4, 2014, Lucy DeYoung/EW filed a C-6 report electronically identifying Ms. DeYoung as the sponsor. **Exhibit #7.** The C-6 report filed by Lucy DeYoung/EW

disclosed electioneering communications that were paid for by Ms. DeYoung totaling \$12,038, all made in opposition to Bernie Talmas' candidacy, and listed the same information as previously discussed in this Report of Investigation.

### **Lucy DeYoung/EW Postcards/Communications**

3.18 During the 2013 election, Lucy DeYoung/EW produced and distributed five postcards and two telephone "robo-calls" that prominently identified and attacked the character and campaign tactics of incumbent Woodinville Mayor Bernie Talmas, a candidate for re-election to that office in 2013. In accordance with WAC 390-16-063, the postcards that met the definition of "electioneering communication" in RCW 42.17A.005(19) were required to be reported as such on form C-6 within 24 hours of being presented to the public. Because all five of the postcards attacked the character and campaign tactics of Bernie Talmas, they also met the definition of independent expenditure political advertising, and were required to display a statement of sponsor identification taking the form, "No candidate authorized this ad. It is paid for by (name, address, city, state)." Finally, Ms. DeYoung's initial independent expenditure political advertisement postcard, and her two "robo-calls," did not meet the definition of an electioneering communication, but were nevertheless required to be disclosed on PDC form C-6 within five business days of Ms. DeYoung's expenditures.

The five postcards are described as follows:

#### **Ethical Woodinville/Lucy DeYoung Postcard No. 1:**

- 3.19 Postcard No. 1 was titled "Bullying at Woodinville City Hall." The postcard was received on August 29, 2013, which indicates it was presented to the public more than 60 days prior to the November 5, 2013 general election. As such, it did not constitute an electioneering communication. However, as discussed above, because the postcard constituted independent expenditure political advertising, it was required to be disclosed on PDC form C-6 within five business days of Ms. DeYoung's expenditure, and was not disclosed.
- 3.20 Postcard No. 1 referenced a "Woodinville Weekly" article about Mayor Talmas attempting "to bully a fellow council member into resigning"; and alleged that he accessed a Woodinville City Councilmember's financial information and had someone watching the councilmember's house. The postcard stated "*This kind of behavior is embarrassing to Woodinville. We should expect more from our Mayor and City Council*" and provided a website address for EW and a telephone number for information about contacting a Woodinville City Councilmember. The postcard ended by stating: "*Call Bernie Talmas...Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct...*"
- 3.21 On November 17, 2014, PDC staff contacted Mr. Lamb and informed him that staff has determined the content of Postcard No. 1 constituted "express advocacy" in opposition to a candidate, which made the postcard a political advertisement and reportable by Ms. DeYoung as an independent expenditure. Staff suggested that Mr. Lamb ask Ms. DeYoung to file a C-6 report disclosing the costs of Postcard No. 1 as an independent



expenditure on a C-6 report. Mr. Lamb indicated that he would contact Ms. DeYoung and request that she file a C-6 report.

#### **Ethical Woodinville/Lucy DeYoung Postcard No. 2:**

3.22 Postcard No. 2 was received on September 10, 2013, and began by stating “Bernie Talmas and Boundy-Sanders called citizens and other council members *‘bitch’ ‘evil’ and ‘mean cafeteria lady.’*” The postcard was mailed within 60 days of the 2013 general election and was reportable as an electioneering communication. The postcard:

- Alleged that Ms. Boundy-Sanders sent an email to supporters of Mayor Talmas about the 2013 Woodinville City Council elections, and referred to certain Woodinville citizens using the words listed above.
- Stated: *“Is this junior high School and it’s all about them? Or are they our elected public servants working for Woodinville.”*
- Ended by stating *“Call Bernie Talmas...Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct...”*

#### **Ethical Woodinville/Lucy DeYoung Postcard No. 3:**

3.23 Postcard No. 3 was received on September 24, 2013, and began by stating that a political operative of Mr. Talmas *“...harassed a City Councilman, taking photos on his property when no one was home.”* The postcard:

- Stated *“On March 10, 2013, one of Talmas’ agents went onto the [unidentified] Councilmember’s private property [and] photographed what he claimed were ‘code violations’ for repairs being made to the Councilmember’s leased home.”*
- Included a picture of a sign stating *“Private Property No Trespassing”* followed by *“...yes, that means you, Bernie Talmas!”*
- Ended by stating *“Call Bernie Talmas...Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct...”*

#### **Ethical Woodinville/Lucy DeYoung Postcard No. 4:**

3.24 Postcard No. 4 was received by Ms. Boundy-Sanders on October 19, 2013, and submitted by her as Addendum #1 to her complaint. The postcard displayed a picture of an eye peering through a hole in the wall and was entitled *“Peeping Bernie.”* The postcard:

- Began by stating *“Bernie Talmas had an informant who watched the home of another Councilman late at night.”*
- Stated *“At the Feb. 12, 2013 City Council meeting, Mayor Bernie Talmas tried to bully a fellow Councilman into resigning on the spot.”*
- Included the statement in a box on the right side panel *“Call Bernie Talmas...Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct...”*

### **Ethical Woodinville/Lucy DeYoung Postcard No. 5:**

3.25 Postcard No. 5 was received by Ms. Boundy-Sanders on October 19, 2013, and submitted by her as Addendum #2 to her complaint. The postcard began by stating "*Bernie Talmas: a pattern of bullying.*" The postcard provided information concerning Mr. Talmas under five separate bullet points, repeating claims from prior postcards about his demand for the resignation of another Councilmember, and harassing him about an alleged "fraudulent voter registration" and name calling. The postcard:

- Stated "*Talmas operative trespassed onto private property to photograph Councilman's home and sent a threatening email to City Hall.*"
- Stated "*Following this pattern of harassment and bullying by Talmas, the City Council voted to draft stronger ethics rules governing Council behavior. Talmas voted no.*"
- Stated: "*When the new, stronger ethics rules are drafted and come before the City Council for a final vote, Bernie Talmas and the City Council should vote yes. We need civility at Woodinville City Hall.*"
- Ended by stating in a box on the right side panel "*Call Bernie Talmas today...and demand he vote yes on stricter ethics rules for Council conduct...*"

### **Content of Telephone Calls**

3.26 Robo-call No. 1 was produced on August 9, 2013, but was presented to the public on October 21, 2013. Its content was:

"Hi. I'm with a group called Ethical Woodinville, and I'm calling for the group to ask for your help. The Woodinville Weekly reported how Mayor Bernie Talmas tried to bully a fellow council member into resigning. Talmas claimed that he personally had access to other councilmen's private financial documents, and that his people had been watching the councilman's wife and son outside their house late at night. Any parent with children would find this disturbing. Meanwhile, there is still nothing happening on downtown traffic. Widening projects sit stagnant while Bernie Talmas squabbles with councilmembers. Please join us and call Bernie Talmas today. Ask him to vote "Yes" on stricter ethics rules for council conduct. Visit us at [ethicalwoodinville.com](http://ethicalwoodinville.com) or call 425-949-6752 for information on how to contact your councilmember."

3.27 Robo-call No. 2 was produced on August 15, 2013, but was presented to the public on October 21, 2013. Its content was:

"Hi. I'm with Ethical Woodinville, and I'm asking for your help. Recently, Mayor Bernie Talmas demanded that another city Councilman resign, and the Councilman refused, so one of Bernie Talmas' political operatives harassed the Councilman by filing a challenge to his voter registration. Even though the Councilman had released his personal rental agreement, and proved the allegation false, Talmas and his people kept bullying and harassing him. So as Bernie Talmas is busy taking sides with other Councilmen, downtown traffic gets worse. Please call Bernie Talmas today. Ask him to vote "Yes" on stricter ethics rules for council conduct, and get back to doing what we elected him to do. Visit us at [ethicalwoodinville.com](http://ethicalwoodinville.com) or call 425-949-6752 for information on how to contact your councilmember."

### **Sponsor Identification in Postcards/Telephone Calls**

3.28 None of Ms. DeYoung's electioneering communication postcards, her independent expenditure political advertising postcard, or her independent expenditure political advertising telephone calls included a statement of sponsor identification taking the form, "No candidate authorized this ad. It is paid for by (name, address, city, state)." Rather, the postcards identified Ethical Woodinville with a web address and a rented UPS mailing address. The telephone calls identified Ethical Woodinville with a web address and telephone number. None of the communications identified Ms. DeYoung as their sponsor.

### **Lucy DeYoung Prior PDC Filing History**

3.29 Ms. DeYoung :

- Was a Statewide Candidate seeking the office of Washington State Treasurer in 1996. Ms. DeYoung was defeated in the 1996 general election after her campaign raised and spent more than \$230,000.
- Served as a Woodinville City Councilmember from 1993 to 1997.
- Served as a Member of the Washington Public Stadium Authority from 2001 to 2005.
- Filed two C-6 reports on behalf of her father, Al DeYoung, in 2009 (one on paper, and one electronically). The C-6 reports were filed as electioneering communications for political advertisements in support of Charles Pilcher, a candidate for King County Hospital District 2. **Exhibit #8**

3.30 Ms. DeYoung stated that Al DeYoung is her father. In 2009, Mr. DeYoung made expenditures in support of Charles Pilcher, a candidate for King County Hospital Commissioner which required him to file a C-6 report. Ms. DeYoung stated that she filed one C-6 report twice on behalf of her father for electioneering communications he made, one on paper and the same report electronically, because her father did not have a computer. She stated that she filed the report after receiving direction from Dave Mortenson, a political consultant hired by her father to assist him with his electioneering communications.

3.31 Ms. DeYoung has no prior PDC violations.

#### **IV. Scope**

- 4.1 PDC staff reviewed the complaint filed by Susan Boundy-Sanders against Ethical Woodinville on October 3, 2013, Addendum #1 she submitted on October 11, 2013, and Addendum #2 submitted on October 23, 2013.
- 4.2 On December 16, 2013, PDC staff sent a letter to IQ Direct, in accordance with RCW 42.17A.345, requesting information concerning the five postcards sponsored by Ethical Woodinville that featured Bernie Talmas. The letter was returned to PDC staff as not deliverable to the address provided.

4.3 PDC Staff reviewed the following:

- Articles, Letters to the Editor, and Other Information in the Woodinville Weekly concerning actions and comments about the Woodinville City Council and the 2013 election.
- Grass Roots Lobbying reports (L-6 report) filed by Ethical Woodinville/Lucy DeYoung on January 10, 2014.
- February 6, 2014, email from Mark Lamb, an attorney with the North Creek Law Firm, representing Ethical Woodinville/Lucy DeYoung, in which he attached a three-page response letter and an emailed copy of an Independent Expenditure/Electioneering Communications Report (C-6 report).
- February 7, 2014 C-6 report filed by Ethical Woodinville/Lucy DeYoung disclosing electioneering communications undertaken during the 2013 election cycle.

V.  
Laws

- 5.1 **RCW 42.17A.005(19)(a)** defines "Electioneering communication" to mean any broadcast, cable, or satellite television or radio transmission, United States postal service mailing, billboard, newspaper, or periodical that: (i) Clearly identifies a candidate for a state, local, or judicial office either by specifically naming the candidate, or identifying the candidate without using the candidate's name; (ii) Is broadcast, transmitted, mailed, erected, distributed, or otherwise published within sixty days before any election for that office in the jurisdiction in which the candidate is seeking election; and (iii) Either alone, or in combination with one or more communications identifying the candidate by the same sponsor during the sixty days before an election, has a fair market value of one thousand dollars or more.
- 5.2 **RCW 42.17A.005(36)** defines "Political advertising" to include any advertising displays, newspaper ads, billboards, signs, brochures, articles, tabloids, flyers, letters, radio or television presentations, or other means of mass communication, used for the purpose of appealing, directly or indirectly, for votes or for financial or other support or opposition in any election campaign.
- 5.3 **RCW 42.17A.005(26) (26)** defines "Independent expenditure" as an expenditure that has each of the following elements:
- (a) It is made in support of or in opposition to a candidate for office by a person who is not (i) a candidate for that office, (ii) an authorized committee of that candidate for that office, (iii) a person who has received the candidate's encouragement or approval to make the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office, or (iv) a person with whom the candidate has collaborated for the purpose of making the expenditure, if the expenditure pays in whole or in part for political advertising supporting that candidate or promoting the defeat of any other candidate or candidates for that office;

(b) The expenditure pays in whole or in part for political advertising that either specifically names the candidate supported or opposed, or clearly and beyond any doubt identifies the candidate without using the candidate's name; and

(c) The expenditure, alone or in conjunction with another expenditure or other expenditures of the same person in support of or opposition to that candidate, has a value of \*eight hundred dollars or more.<sup>2</sup> A series of expenditures, each of which is under eight hundred dollars, constitutes one independent expenditure if their cumulative value is eight hundred dollars or more.

- 5.4 **Washington State Supreme Court's ruling in *Washington State Republican Party v. Public Disclosure Commission*, 141 Wn.2d245 (2000) (WSRP).** (Excerpt) The Court further stated, in defining "express" advocacy, that when an ad "is unmistakable and unambiguous in its meaning, and presents a clear plea for the listener to take action to defeat[a] candidate," it is "express" advocacy. *Id.* At 273. The Supreme Court held as "important" that if, in an ad, "a candidate's character and campaign tactics are attacked, the ad may be subject to only one reasonable interpretation: an exhortation to vote against the candidate." *Id.* At 270. In contrast, the Court described "issue" advocacy as advocacy that "intend[s] to inform the public about political issues germane to [an] election." *Id.* At 272. This paragraph is from the meeting materials for the January 26, 2012 Commission Meeting, on page 122 of 312.
- 5.5 **RCW 42.17A.255** states: (1) For the purposes of this section the term "independent expenditure" means any expenditure that is made in support of or in opposition to any candidate or ballot proposition and is not otherwise required to be reported pursuant to RCW 42.17A.220, 42.17A.235, and 42.17A.240. ... (2) Within five days after the date of making an independent expenditure that by itself or when added to all other such independent expenditures made during the same election campaign by the same person equals one hundred dollars or more, or within five days after the date of making an independent expenditure for which no reasonable estimate of monetary value is practicable, whichever occurs first, the person who made the independent expenditure shall file with the commission an initial report of all independent expenditures made during the campaign prior to and including such date.
- 5.6 **RCW 42.17A.305** requires that a payment for any electioneering communication shall be reported to the commission by the sponsor, and include: (a) Name and address of the sponsor; (b) Source of funds for the communication, (c) Name and address of the person to whom an electioneering communication related expenditure was made; (d) A detailed description of each expenditure of more than one hundred dollars; (e) The date the expenditure was made and the date the electioneering communication was first broadcast, transmitted, mailed, erected, distributed, or otherwise published; (f) The amount of the expenditure; and (g) The name of each candidate clearly identified in the electioneering communication, the office being sought by each candidate, and the amount of the expenditure attributable to each candidate. The sponsor of an electioneering communication shall report to the commission within twenty-four hours of, or on the first working day after, the date the electioneering communication is broadcast, transmitted,

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<sup>2</sup> Per WAC 390-05-400, in 2013 this dollar amount was set at \$900.

mailed, erected, distributed, or otherwise published.

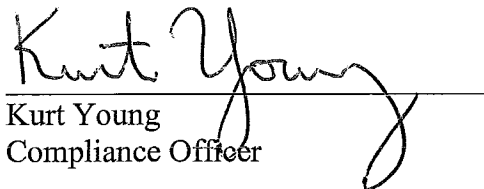
5.7 **RCW 42.17A.320** requires (1) All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address. All radio and television political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name. The use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising shall be unlawful. For partisan office, if a candidate has expressed a party or independent preference on the declaration of candidacy, that party or independent designation shall be clearly identified in electioneering communications, independent expenditures, or political advertising.

(2) In addition to the information required by subsection (1) of this section, except as specifically addressed in subsections (4) and (5) of this section, all political advertising undertaken as an independent expenditure or an electioneering communication by a person or entity other than a bona fide political party must include as part of the communication:

(a) The statement: "No candidate authorized this ad. It is paid for by (name, address, city, state)"; ...

5.8 **RCW 42.17A.435** states that no contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

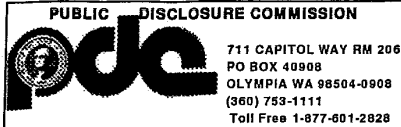
Respectfully submitted this 25<sup>th</sup> day of November, 2014.

  
Kurt Young  
Compliance Officer

#### List of Exhibits

- Exhibit #1** March 28, 2013, Candidate Registration filed by Bernie Talmas.
- Exhibit #2** October 3, 2013, complaint filed by Susan Boundy-Sanders against Ethical Woodinville, which includes Addendum #1 received on October 11, 2013, and Addendum #2 received on October 23, 2013.
- Exhibit #3** Newspaper articles concerning postcards and robo-calls made by Ethical Woodinville
- Exhibit #4** February 6, 2014, email received from Mark Lamb, an attorney with the North Creek Law Firm, submitted on behalf of Ethical Woodinville/Lucy DeYoung.

- Exhibit #5** January 10, 2014, Ethical Woodinville/Lucy DeYoung files five Grass Roots Lobbying reports (L-6 reports) as the sponsor of a grass roots lobbying campaign for “Stronger ethical rules for the City of Woodinville City Council Conduct.”
- Exhibit #6** February 7, 2014, Ethical Woodinville/Lucy DeYoung files a C-6 report manually on paper.
- Exhibit #7** March 4, 2014, Ethical Woodinville/Lucy DeYoung files a C-6 report electronically.
- Exhibit #8** Two C-6 reports filed by Ms. DeYoung on behalf of her father, Al DeYoung in 2009, (one on paper, and one electronically) as electioneering communications in support of Charles Pilcher, a candidate for King County Hospital District 2.42



# Candidate Registration

**C1**  
(1/2008)

100518327  
03-28-2013

Candidate's Name (Give candidate's full name.) <b>BERNARD W TALMAS</b>		Telephone Number 425-908-7271
Candidate's Committee Name (Do not abbreviate.) <b>FRIENDS OF BERNIE TALMAS</b>		Fax Number

Mailing Address <b>15207 NE 201ST STREET</b>		Candidate's E-Mail Address <b>BWTALMAS@IX.NETCOM.COM</b>
City <b>WOODINVILLE</b>	County <b>KING</b>	Zip + 4 <b>98072</b>
		Campaign E-Mail Address <b>bwtalmas@ix.netcom.com</b>

1. What office are you running for? <b>CITY COUNCIL MEMBER</b>	Legislative District, County or City <b>CITY OF WOODINVILLE</b>	Position No. <b>7</b>	Do you now hold this office? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Political party (if partisan office) <b>NON PARTISAN</b>		3. Date of general or special election <b>11-05-2013</b>	

4. How much do you plan to spend during your entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. If no box is checked you are obligated to use Option II, Full Reporting. See instruction manuals for information about reports required and changing reporting options.

**Option I MINI REPORTING:** In addition to my filing fee of \$\_\_\_\_\_, I will raise and spend no more than \$5,000, including any charges for inclusion in state and local voters pamphlets. I will not accept more than \$500 in the aggregate from any contributor except myself.

**Option II FULL REPORTING:** I will use the Full Reporting system. I will file the frequent, detailed campaign reports required by law.

5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No <u>X</u> . See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. <b>BERNARD W TALMAS</b> <b>15207 NE 201ST STREET, WOODINVILLE WA 98072</b>	<input type="checkbox"/> Continued on attached sheet.	Daytime Telephone Number <b>425-908-7271</b>
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6. Persons who perform only ministerial functions on your behalf and on behalf of other candidates or political committees. List name, title and address of these persons. See WAC 390-05-243 and next page for details.  Continued on attached sheet.

7. Committee Officers and other persons who authorize expenditures or make decisions on your behalf. List name, title and address. See next page for definition of "officer."  Continued on attached sheet.

8. Campaign Bank or Depository <b>BANK OF AMERICA</b>	Branch <b>WOODINVILLE</b>	City <b>WOODINVILLE</b>
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9. Related or Affiliated Political Committees. List name, address and relationship.  Continued on attached sheet.

10. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.

**Street Address, Room Number, City where campaign books will be available for inspection**  
**15207 NE 201ST STREET, WOODINVILLE**  
In order to make an appointment, contact the campaign at (telephone, fax, e-mail): **425-908-7271 BWTALMAS@IX.NETCOM.COM**

11. **CERTIFICATION:**  
I certify that this report is true, complete and correct to the best of my knowledge.

**Candidate's Signature**  
**BERNARD W TALMAS**

**Date**  
**03-28-2013**



1 October 2013

**RECEIVED**

OCT -3 2013

Public Disclosure Commission

Washington State Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

Dear PDC:

Attached please find a complaint against the persons calling themselves "Ethical Woodinville."  
Attachments are included as evidence.

I've received an email thread between Toby Nixon and Kurt Young, taking place over the past few days. Mr. Young's initial thoughts about the EthicalWoodinville.com Web site were, "it is not clear that the content of the information constitutes political advertising since the message is to contact Bernie Talmas about activities that are apparently related to the City Council and Mayor and not discussing a candidate."

We believe that Ethical Woodinville's activities – Web site, robocalls, letter to the editor, and postcards, do indeed fall under RCW 42.17A. Our analysis is documented in Section 2 of the complaint form.

Kind regards,



Susan Boundy-Sanders  
17859 149<sup>th</sup> Ave. NE  
Woodinville, WA  
98072-6202  
425.591.3672

OCT - 3 2013



Public Disclosure Commission

**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION  
COMPLAINT FORM**

*(See instructions on the last page.)*

**Description of Complaint**

**1. RESPONDENT:**

**Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.**

*Example #1: Joe Public, Mayor of My Town,*

*123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown*

*Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State, Phone: 555-123-4567, Email: pag@pag.org*

The persons representing themselves as "Ethical Woodinville"  
14241 NE Woodinville-Duvall Road, PMB 156, Woodinville, WA, 98072  
EthicalWoodinville@hotmail.com  
425.949.6752  
EthicalWoodinville.com (forwards to EthicalWoodinville.blogspot.com)

**2. ALLEGED VIOLATIONS:**

**Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)**

The paragraphs below provide justification that the persons calling themselves Ethical Woodinville are identifying candidates by name, engaging in political advertising and electioneering communications, and are making campaign expenditures, and therefore are subject to RCW 42.17A.

Specific violations of the RCW follow.

Our complaints are that Ethical Woodinville operates anonymously (in fact, has gone to expense to cloak its identity through means such as proxy services and confidentiality agreements) and fails to comply with the registration and reporting requirements of the Revised Code of Washington. Within those overall complaints, we allege violations of specific code sections as listed below.

Ethical Woodinville claims that it is not involving itself in Woodinville's City Council elections; it claims its only goal is stronger ethics rules. We believe this is a disingenuous claim: It attacks candidates Bernie Talmas and Susan Boundy-Sanders

by name and advocates changes to the ethics code that Woodinville's city attorney has publicly stated are prohibited by state law and legal precedent.

Ethical Woodinville's advertising meets the criteria of political advertising in RCW 42.17A.005: its pieces include:

"flyers . . . [and] . . . other means of mass communication, used for the purpose of appealing, directly **or indirectly**, for votes or for financial or other support or opposition in any election campaign." (emphasis added)

Further indication that Ethical Woodinville's activities fall under campaign disclosure laws is found in RCW 42.17A.300:

"(1) The legislature finds that:

(b) **Electioneering communications that identify political candidates** for state, local, or judicial office and that are **distributed sixty days before an election** for those offices **are intended** to influence voters and the outcome of those elections.

(c) The state has a compelling interest in providing voters information about electioneering communications in political campaigns concerning candidates for state, local, or judicial office so that voters can be fully informed as to the: (i) **Source of support or opposition** to those candidates; and (ii) **identity of persons** attempting to influence the outcome of state, local, and judicial candidate elections.

(d) Nondisclosure of financial information about advertising that **masquerades as relating only to issues and not to candidate campaigns fosters corruption** or the appearance of corruption. These consequences can be substantially avoided by full disclosure of the identity and funding of those persons paying for such advertising." (emphasis added)

**In summary**, the activities meet the criteria of **political advertising** and **electioneering communications**. Therefore, Ethical Woodinville should register as a **political committee**, **identify** the persons involved, and report its **contributions** and **expenditures**.

This complaint is important because of the significant and apparently deliberate attempts to circumvent public disclosure laws in the 2013 elections.

Its importance is greater because Woodinville has an **18-year history of anonymous political advertising**, always supporting the same faction of candidates. We are asking the PDC to address a substantive, perennial problem in Woodinville's democratic process.

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**RCW 42.17A.205(1):** "Every political committee shall file a statement of organization with the commission . . ."

**Alleged Violation:** Ethical Woodinville has failed to file a C1PC form with the PDC.

**Supporting Evidence:** 3.01

---

**RCW 42.17A.205(5):** ". . . the "name" of a sponsored committee must include the name of the person that is the sponsor of the committee. If more than one person meets the definition of sponsor, the name of the committee must include the name of at least one sponsor, but may include the names of other sponsors"

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**Alleged Violation:** Ethical Woodinville has failed to use the sponsor(s) name(s) in the committee name.

**Supporting Evidence:** Self-evident.

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**RCW 42.17A.320(1):** "All written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address. All radio and television political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name. The use of an assumed name for the sponsor of electioneering communications, independent expenditures, or political advertising shall be unlawful."

**Alleged Violation:** Ethical Woodinville has failed to include the sponsor's name in its political advertising and electioneering communications.

**Supporting Evidence:** 3.03, 3.04, 3.05, 3.08, 3.09, 3.10, 3.13

---

**RCW 42.17A.235:** The political committee "must file . . . a report of all contributions received and expenditures made . . . on the tenth day of each month."

**Alleged Violation:** Ethical Woodinville has demonstrable expenditures starting no later than August 7, 2013 but as of this writing (September 13, 2013) shows no C4 reports.

**Supporting Evidence:** 3.01

---

**RCW 42.17A.320(2):** "(2) . . . all political advertising undertaken as an independent expenditure or an electioneering communication by a person or entity other than a bona fide political party must include as part of the communication: (a) The statement: "No candidate authorized this ad. It is paid for by (name, address, city, state)"

**Alleged Violation:** Ethical Woodinville has failed to state whether it is associated with a candidate or candidate's committee. If not associated, it has failed to include the required disclaimer in its political advertising and electioneering communications.

**Supporting Evidence:** 3.03, 3.04, 3.05, 3.08, 3.09, 3.10, 3.13

---

**RCW 42.17A.320(2)(b):** "If the sponsor is a political committee, the statement: "Top Five Contributors," followed by a listing of the names of the five persons or entities making the largest contributions in excess of seven hundred dollars reportable under this chapter during the twelve-month period before the date of the advertisement or communication"

**Alleged Violation:** Ethical Woodinville's political advertising and electioneering communications have failed to list contributors.

**Supporting Evidence:** 3.03, 3.04, 3.05, 3.08, 3.09, 3.10, 3.13

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**Evidence and Witnesses**

Public Disclosure Commission

**3. EVIDENCE:**

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

- o Evidence 3.01: Screen shots of pdc.wa.gov, showing absence of Ethical Woodinville from PDC's public database of single year and continuing committees.
- o Evidence 3.02: Domain name registration and Whois anonymous proxy services for EthicalWoodinville.com, August 7, 2013
- o Evidence 3.03: Web site EthicalWoodinville.com, August 6 2013 to present
- o Evidence 3.04: Robocall 1, August 9, 2013 (attached to doc and on CD)
- o Evidence 3.05: Robocall 2, August 15, 2013 (attached to doc and on CD)
- o Evidence 3.06: Reverse phone lookup results for robocall origination number
- o Evidence 3.07: Email correspondence with Ethical Woodinville, August 15-19, 2013
- o Evidence 3.08: Postcard 1, August 29, 2013
- o Evidence 3.09: Postcard 2, September 10, 2013
- o Evidence 3.10: Postcard 3, September 24, 2013
- o Evidence 3.11: Mailing house IQ Direct has confidentiality agreement with consultancy representing Ethical Woodinville
- o Evidence 3.12: Private mailbox
- o Evidence 3.13: Letter to editor, August 2, 2013
- o Evidence 3.14: Editor's request that Ethical Woodinville identify themselves, August 9, 2013
- o Evidence 3.99: Due diligence to identify persons representing themselves as Ethical Woodinville
- o CD containing sound files of robocalls

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**4. WITNESSES:**

**List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.**

Allen, Candice B	14520 NE 180th St	Woodinville	(425) 483-3338
Boundy-Sanders, Susan Q	17859 149 <sup>th</sup> Ave NE	Woodinville	(425) 591-3672
Montgomery, Nancy M	15019 NE 201 <sup>st</sup> St	Woodinville	(425) 483-1712
Peterson, Sharon	15206 NE 202 <sup>nd</sup> St	Woodinville	(425) 485-6296
Pregler, Arthur G	18402 148 <sup>th</sup> Ave NE	Woodinville	(425) 908-7083
Stecker, Henry L	19026 152nd Ave NE	Woodinville	(425) 483-8804
Taylor, Alfred Herbert	18619 168 <sup>th</sup> Ave NE	Woodinville	(425) 949-5786
Tountas, Peter L	12505 NE 164th St	Woodinville	(425) 488-4424
Waters, Paula	14704 NE 184 <sup>th</sup> Pl	Woodinville	(425) 481-2758
Yabroff, Stephen M	19320 162 <sup>nd</sup> Ave NE	Woodinville	(425) 486-4458

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**Certification**

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**In signing this complaint:**

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Susan Boundy-Sanders

Street address 17859 149<sup>th</sup> Ave. NE

City, state and zip code Woodinville, WA 98072

Telephone number (including area code) (425) 591-3672

E-mail address (optional) sbsand@hotmail.com

**Oath**

**Required for complaints against elected officials or candidates for elective office:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.\*

Your signature *Susan Boundy-Sanders*

Date signed 30 September 2013

Place signed (city and county)

Woodinville King  
City County

**Attachments**

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

\*RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

**Washington State Public Disclosure Commission**  
**Instructions for Filing a Formal Complaint**

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**✦ When to use the formal complaint form:**

Public Disclosure Commission

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at [www.pdc.wa.gov](http://www.pdc.wa.gov). If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

**✦ How to submit your complaint form to the PDC:**

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

**✦ If you have more questions:**

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at [www.pdc.wa.gov](http://www.pdc.wa.gov) under "Enforcement and Compliance." You may also contact the PDC directly.

**PDC Contact Information**

**MAILING ADDRESS:** Washington State Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

**EMAIL ADDRESS:** [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

**PHONE:** 1-877-601-2828 (toll free)

**FAX:** (360) 753-1112

**HOURS:** Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.



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## Index of Attachments

Public Disclosure Commission

Attachments to this complaint:

- **Evidence 3.01:** Screen shots of [pdc.wa.gov](http://pdc.wa.gov), showing absence of Ethical Woodinville from PDC's public database of single year and continuing committees.
- **Evidence 3.02:** Domain name registration and Whois anonymous proxy services for [EthicalWoodinville.com](http://EthicalWoodinville.com), August 7, 2013
- **Evidence 3.03:** Web site [EthicalWoodinville.com](http://EthicalWoodinville.com), August 6 2013 to present
- **Evidence 3.04:** Robocall 1, August 9, 2013 (attached to this document, and on CD)
- **Evidence 3.05:** Robocall 2, August 15, 2013 (attached to this document, and on CD)
- **Evidence 3.06:** Reverse phone lookup results for robocall origination number
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- **Evidence 3.12:** Private mailbox
- **Evidence 3.13:** Letter to editor, August 2, 2013
- **Evidence 3.14:** Editor's request that Ethical Woodinville identify themselves, August 9, 2013
- **Evidence 3.99:** Due diligence to identify persons representing themselves as Ethical Woodinville
- **Historical context:** The perennial presence of an anonymous political committee in Woodinville
- **CD** containing all files related to this complaint, including the sound files of the robocalls listed as Evidence 3.04 and 3.05.

# Evidence 3.01: Ethical Woodinville has not filed a C1PC with the PDC

Despite conducting political advertising that requires expenditures for the past five weeks, Ethical Woodinville does not appear in the PDC database for either continuing or one-year political committees as of this writing, 30 September 2013:

Continuing Committees - Windows Internet Explorer

http://www.pdc.wa.gov/MyQuery/System/Committee/continuing\_committees?year=2013

Public Disclosure Commission  
Shining Light on Washington Politics

HOME PUBLIC RESOURCES FILER RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE FILING

ELECTION TOTALS CANDIDATES COMMITTEES INDEPENDENT EXPENDITURES LAST MINUTE CONTRIBUTIONS LOBBYING ADVANCED

CONTINUING SINGLE YEAR INITIATIVE CAUCUS PARTY

Year: 2013 Total Raised: \$16,394,819.49 Total Spent: \$5,923,873.48

NOTE: Click on a column header to sort by that column, or click on the icon to filter your results

Drag a column header and drop it here to group by that column.

Details	Name	Type	Raised	Spent	Debt
Details	EASTERN WA VOTERS	I	\$17,654.03	\$9,384.99	\$0.00
Details	EASTERN WASHINGTON PAC	O	\$2,083.05	\$2,084.00	\$0.00
Details	EASTSIDE BUSINESS ALLIANCE	B	\$18,581.22	\$10,724.00	\$0.00
Details	EASTSIDE LEADERSHIP COMM	I	\$0.00	\$0.00	\$0.00
Details	EASTSIDE PROGRESS	I	\$0.00	\$0.00	\$0.00
Details	EDUCATION VOTERS POLITICAL ACTION FUND	I	\$7,844.14	\$731.33	\$0.00
Details	ELECTRICAL WORKERS PAC 46	U	\$13,188.86	\$2,846.46	\$0.00
Details	EMPLOYMENT FOR ALL	I	\$0.00	\$0.00	\$0.00
Details	ENTERPRISE WA JOBS PAC	O	\$278,852.93	\$92,558.40	\$0.00
Details	ENVISION SEATTLE	O	\$0.00	\$0.00	\$0.00
Details	EQUAL RIGHTS WA PAC	I	\$2,526.12	\$2,204.03	\$0.00
Details	EQUALITY SPOKANE	I	\$0.00	\$0.00	\$0.00
Details	EVERGREEN PRIORITIES	O	\$0.00	\$0.00	\$0.00
Details	FAIRPAC / CIT TO UPHOLD THE CONSTITUTION	I	\$10,281.28	\$10,281.28	\$0.00
Details	FAITH & FREEDOM PAC	O	\$0.00	\$0.00	\$0.00

Displaying items 61 - 75 of 384

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Single Year Committees - Windows Internet Explorer

http://www.pdc.wa.gov/HvcQuery/System/Committee/single\_year\_committees

Public Disclosure Commission  
Shining Light on Washington Politics

HOME PUBLIC RESOURCES FILER RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE FILING

ELECTION TOTALS CANDIDATES COMMITTEES INDEPENDENT EXPENDITURES LAST MINUTE CONTRIBUTIONS LOBBYING ADVANCED

CONTINUING SINGLE YEAR INITIATIVE CAUCUS PARTY

Year: 2013 Total Raised: \$2,766,871.74 Total Spent: \$1,996,681.42

NOTE: Click on a column header to sort by that column, or click on the  icon to filter your results

Drag a column header and drop it here to group by that column

Details	Name	Locality	F/A	Raised	Spent	Debt
Details	COMM TO SUPPORT CLALLAM CO FIRE DIST 2		F	\$2,840.00	\$2,380.98	\$0.00
Details	COMMON SENSE SEA TAC	CITY OF SEATAc	A	\$250,138.88	\$151,225.28	\$0.00
Details	ELLENSBURG SCHOOLS BOND COMM	ELLENSBURG SD 401	F	\$7,944.13	\$7,749.18	\$0.00
Details	ENVISION SPOKANE POLITICAL COMM	CITY OF SPOKANE	F	\$25,920.66	\$20,087.26	\$0.00
Details	FAIR ELECTIONS SEATTLE	CITY OF SEATTLE	F	\$62,957.28	\$55,871.30	\$33,880.28
Details	FOUR TACOMA STREETS CAMPAIGN		F	\$9,076.80	\$2,405.17	\$459.75
Details	FORWARD VANCOUVER	CITY OF VANCOUVER		\$5,050.00	\$56.31	\$0.00
Details	FRIENDS OF CENTRAL MASON FIRE & EMS	MASON FIRE PROT.DIST 05	F	\$0.00	\$0.00	\$0.00
Details	FRIENDS OF FAIRWOOD FIRE AND EMS - IAFF L864	KING FIRE PROT DIST 40	F	\$10,500.00	\$10,500.00	\$0.00
Details	FRIENDS OF SELAH SCHOOLS	SELAH SD 119	F	\$0.00	\$0.00	\$0.00
Details	FRIENDS OF THE UNION FIRE DEPT	MASON FIRE PROT DIST 06		\$0.00	\$0.00	\$0.00
Details	FRIENDS OF WHIDBEY GENERAL HOSPITAL	WHIDBEY ISL HOSPITAL DIST	F	\$11,226.16	\$5,344.29	\$0.00
Details	GET ON THE BUS	OKANOGAN CO	F	\$0.00	\$0.00	\$0.00
Details	GOOD SCHOOLS - NO PROP 2	SEATTLE SCHOOL DIST 801	A	\$2,775.00	\$2,775.00	\$0.00
Details	GREAT SEATTLE SCHOOLS			\$32,750.00	\$32,516.00	\$17,500.00

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**Evidence 3.02: Domain name registration and Whois proxy service,  
August 7, 2013**

Registration of the domain name EthicalWoodinville.com occurred on August 7, 2013. The registration date indicates a date by which expenditures began. The registrants purchased anonymous proxy services for the domain name. This is an add-on, opt-in service that hides the registrant's identity, but incurs an additional charge. This is an unambiguous indicator of intent to hide the identity of the persons involved.



Find a domain

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Products ▾ Domain Names Websites

**WHOIS search results for:**  
**ETHICALWOODINVILLE.COM**  
(Registered)

Domain Name: ETHICALWOODINVILLE.COM  
Registrar URL: http://www.godaddy.com  
Updated Date: 2013-08-07 12:09:35  
Creation Date: 2013-08-07 12:09:35  
Registrar Expiration Date: 2014-08-07 12:09:35  
Registrar: GoDaddy.com, LLC  
Domain Status: clientDeleteProhibited  
Domain Status: clientRenewProhibited  
Domain Status: clientTransferProhibited  
Domain Status: clientUpdateProhibited  
Registrant Name: Registration Private  
Registrant Organization: Domains By Proxy, LLC  
Registrant Street: DomainsByProxy.com  
Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309  
Registrant City: Scottsdale  
Registrant State/Province: Arizona  
Registrant Postal Code: 85260  
Registrant Country: United States

## Evidence 3.03: Web site EthicalWoodinville.com, August 6 to present

Ethicalwoodinville.com forwards to ethicalwoodinville.blogspot.com.

Blogspot provides free Web hosting but writing, laying out, and coding the content probably involved an expenditure. The Web site, still active as of September 30, 2013, constitutes an electioneering communication under RCW 42.17A.005(19)(a).

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## For an Ethical Woodinville...

Public Disclosure Commission

For an Ethical Woodinville...

*Please call Mayor Bernie Talmas at 425-489-2700 425-489-2700 FREE or email citycouncil@ci.woodinville.wa.us and ask him to support stronger ethics rules for the city council that oppose cyber bullying and promote civility in Woodinville City government.*

Sunday, December 1, 2013

### Bernie Talmas...a legacy of bullying

Plenty of City Councils have spats or disagreements. Plenty of City Councils and Mayors get into heated discussions over issues critical to their community. But it is truly rare to see things devolve into the kind of personal vitriol that Woodinville citizens have witnessed from our Mayor over the past year.

As isolated incidents, we might forgive, forget and move on. But taken as a whole, as a pattern of behavior, it is easy to see why stricter rules are needed to keep Councilmembers (and Mayors!) with a strong personal agenda in check.

Let us review the pattern of bullying and abuse that Woodinville has witness from Bernie Talmas and his supporters over the past year alone.

**1) On February 12, 2013**, Talmas blind-sided a fellow Councilmember at a council meeting, demanding he resign. Talmas claimed to have proof that this Councilmember was no longer living in the city, citing one of his political supporters and minions who had been observing the home and the family's comings and goings at night surreptitiously. Talmas even claimed to have read private "loan documents from Bank of America" that are not available without a court order.

<!--[endif]-->



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Wednesday, September 4, 2013

## **Threatening Letter with Needle Sent to City Hall**

Public Disclosure Commission

The Woodinville Weekly reported this week that a threatening letter with a sharp needle was sent to City Hall.

Inside the envelope was a page print-out of the EthicalWoodinville.com home page and the words scrawled:

" THE SIMPLEST SOLUTION WOULD BE TO SEW SHUT ASPEN'S MOUTH."

It is a sad event when these kind of things do not surprise us anymore.

Aspen's reply was spot on: "I am not sure if citizens think they can behave badly because some of the city leadership does or the city leadership behaves badly because some of our citizens do."

Maybe some Council members are starting to get it. We hope so.

Remember to contact your Council members and ask them to support stronger ethics rules for Council behavior. We might not be able to hold accountable every random crazy person who sends needles to City Hall, but we can hold our own elected officials to a higher standard.

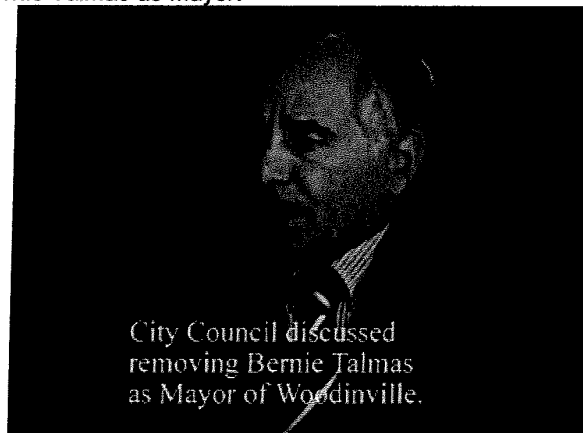
Posted by [Ethical Woodinville](#) at 1:58 AM No comments:

Email ThisBlogThis!Share to TwitterShare to Facebook

Tuesday, August 13, 2013

## **It got so bad...**

The lack of civility on the City Council reached such a low, that the City Council actually considered options for removing Bernie Talmas as Mayor.



Read the story here.

At the end of the discussion, the City Council:

*"Directed staff to prepare an amendment to the Code of Ethics to require councilmembers to exercise proper decorum and not to engage in electronic workplace cyber-bullying."*

*"Directed staff to prepare an amendment to the Code of Ethics to make factually inaccurate communications by councilmembers, a violation of the Code of Ethics."*

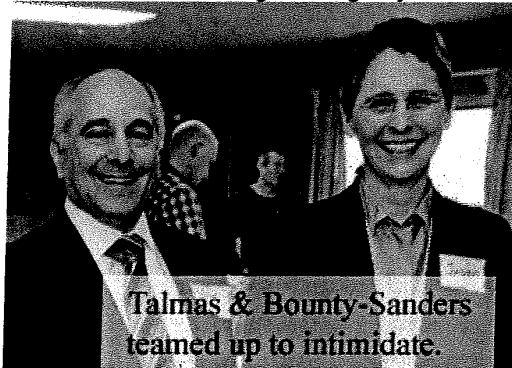
Those important ethics changes are critical to Woodinville moving forward. Contact Bernie Talmas and the City Council today and ask them to please pass these new, stricter rules.

Call 425-489-2700      425-489-2700 FREE    or email [citycouncil@ci.woodinville.wa.us](mailto:citycouncil@ci.woodinville.wa.us).  
Posted by Ethical Woodinville at 5:13 PM No comments:  
Email ThisBlogThis!Share to TwitterShare to Facebook  
Labels: [bernie talmas](#), [susan bounty-sanders](#), [woodinville city council](#)

Thursday, August 8, 2013

## Did you get our phone call?

Many citizens in Woodinville recently received a phone call from us urging them to contact Bernie Talmas and ask him to vote for stricter ethics rules governing City Council behavior.



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If you received a call, and you have found us here online, then **welcome and thank you for your interest in an ethical Woodinville!**

You can contact all the City Councilmen and women by sending one email to: [citycouncil@ci.woodinville.wa.us](mailto:citycouncil@ci.woodinville.wa.us)

You can also call City Hall and make your voice heard to Mayor Talmas and the City Council by calling

425-489-2700      425-489-2700 FREE .

Together we can make a difference for a higher ethical standard and more civility in Woodinville city government.

Posted by Ethical Woodinville at 2:45 PM No comments:  
Email ThisBlogThis!Share to TwitterShare to Facebook  
Labels: [bernie talmas](#), [susan bounty-sanders](#), [woodinville city council](#)

Tuesday, August 6, 2013

## Ethical Woodinville

We elect city leaders because of what they tell us when they campaign. We should expect our city council members and mayor to work as a team for the good of the community and not get bogged down in the quicksand of playing politics.



In other words, they should play nice in the sandbox...because it's not about them, it's about Woodinville.



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That is why citizens of Woodinville have every reason to be embarrassed and frustrated at the legacy that some Council members and especially Mayor Bernie Talmas has left in their wake.

"Ethical Woodinville" is formed to promote civility in our city government and urge Bernie Talmas and the City Council to pass stronger ethics rules that prohibit the kind of bullying and uncivil behavior that has defined this year in Woodinville politics.

Posted by Ethical Woodinville at 11:14 PM No comments:  
Email ThisBlogThis!Share to TwitterShare to Facebook  
Labels: bernie talmas, susan bounty-sanders

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**Evidence 3.04: Robocall, August 8-9, 2013**

**Evidence 3.05: Robocall, August 15, 2013**

Public Disclosure Commission

Woodinville voters with land lines received robocalls from Ethical Woodinville on August 8-9 and August 15, 2013.

The robocalls involved expenditures and the number displayed on caller ID, 425-949-6752, goes to an Ethical Woodinville voice message system, so the phone number also involves an expenditure.

The phone call failed to name the persons behind the group, and failed to state whether the phone call was part of a candidate's campaign.

These sound files are on the attached CD.



3.04.robocall1-aug9-2013.wma



3.05.robocall2-aug15-2013.wma

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### Evidence 3.06: Phone number

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Witnesses with caller ID say that the robocalls received from Ethical Woodinville on August 8-9 and August 15 came from the same phone number displayed on the EthicalWoodinville.com Web site: 425.949.6752. Witnesses who have called the number report that the automated message identifies the recipient as Ethical Woodinville.

This suggests that the phone number requires an expenditure by Ethical Woodinville.

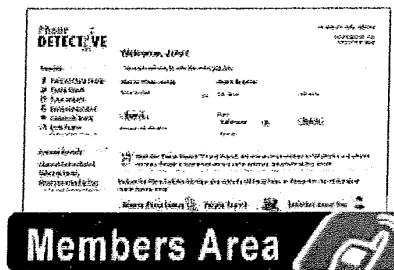
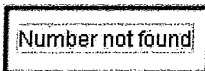
Attempts to identify a subscriber yield no results:



## Congratulations, Your Order Is Complete

Your account has been created and payment received. Your bank statement will show a charge from "Clickbank". A receipt has also been sent to your email address.

- The full results for 425-949-6752 are listed below.
- We've upgraded your account to **30 days free membership**, which gives you access to unlimited people searches, basic phone lookups, and additional information about 425-949-6752. Click the "Members Area" button below to enter:



(opens in new window)

Unfortunately we were unable to identify the owner of 425-949-6752. A majority of phones are found through our site - but some mobile/unlisted numbers are beyond the reach of any online database.

**Evidence 3.07: Email correspondence with Ethical Woodinville, August 15-19, 2013**

The email exchange below ended with Candy Allen (a witness on this complaint) forwarding her correspondence with "Ethical Woodinville" to Susan Boundy-Sanders on August 19.

In the thread, Candy unambiguously asks for the names of the persons operating as Ethical Woodinville. Her correspondent fails to do so.

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Hi Susan –

I've been out of town for a few days. I just came across this email. I think my new "pen pal" has moved on. Or maybe someone else is handling the responses.

Candy

**From:** Ethical Woodinville [mailto:ethicalwoodinville@hotmail.com]  
**Sent:** Saturday, August 17, 2013 12:25 PM  
**To:** Candy Allen  
**Subject:** RE: Received your unsolicited call

We obviously disagree on nearly everything we could possibly discuss regarding this matter. So thank you for your phone number. We will remove it from our lists.

---

**From:** allenck@earthlink.net  
**To:** ethicalwoodinville@hotmail.com  
**Subject:** RE: Received your unsolicited call  
**Date:** Thu, 15 Aug 2013 18:05:05 -0700

Since you neglected to disclose yourselves, I will assume that your aim is to discredit Mr. Talmas before the next election. Maybe you are working on the election committee for another candidate running for the same position? Or maybe you are one of the "few good people" who want to hold a seat on the council? Or perhaps you're just a misinformed hack doing this for a City Council member?

Do you attend the City Council meetings? Are you a registered voter in Woodinville? Have you been involved in other issues that impact the community? Are you a human resources professional who has the expertise to analyze workplace bullying? Obviously since the resolution was tabled, your only other avenue to slime Mr. Talmas is to fabricate issues. I've seen this strategy before. Oh right, Liz Aspen's letter about Mr. Taylor.

Mr. Talmas's demeanor at the City Council meetings is far from bullying. He conducts himself in a manner consistent with his office. I'd be interested in the documentation you have citing instances where Mr. Talmas used "all-out war" behavior against someone who disagreed with him. Have there been legal charges of libel or slander against Mr. Talmas? Have the police been summoned to address a situation in which he has become abusive?

Mr. Hageman's situation does not fit your bullying scenario. Mr. Hageman's behavior was unacceptable in handling his residency issues. His behavior showed a lack of credibility and veracity. If he was indeed considerate of the residents of Woodinville, he would have admitted his error and resigned his position. But he chose to scramble around trying to come with some plausible story explaining his residency issue. I understand that he works in public education and there is an emphasis on preventing bullying in the schools, but he's not in the sixth grade and no one is going to stuff him upside down in a garbage can.

My telephone number is 425-483-3338. I will check with my neighbors to see if they would like their phone numbers removed from your list(s). I'm sure I'm not the only one who feels this way.

Thank you –

CB Allen – Woodinville, WA

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**From:** Ethical Woodinville [mailto:ethicalwoodinville@hotmail.com]  
**Sent:** Thursday, August 15, 2013 4:59 PM  
**To:** Candy Allen  
**Subject:** RE: Received your unsolicited call

We apologize for inconveniencing you and we share many of your frustrations. We are also displeased with many of the issues in town, but the bullying and harassing of people who disagree goes farther than anything we can stomach. That is why we choose to stand up and do something about it.

With Mr. Talmas, it has become much worse than simply not getting along. With Mr. Talmas anyone who dares to disagree with him will find themselves on the receiving end of an all-out war on your reputation and private life. That is one of the reasons why few good people want to run for office or make their voice heard in our community. They simply fear the consequences of citizen activism.

Again, we are sorry you are frustrated with our efforts.

What is the telephone number you received a call from and we will remove it from any lists we have.

---

From: allenck@earthlink.net  
To: EthicalWoodinville@hotmail.com  
Subject: Received your unsolicited call  
Date: Thu, 15 Aug 2013 16:09:42 -0700

WHO ARE YOU PEOPLE? Yes, I received your intrusive, unsolicited phone call. I went to your website and there is no disclosure about who organized this "witch hunt" and if you are even residents of Woodinville.

WHO IS PAYING FOR THIS? The same group of non-residents who think they "own the city" and could care less about the individual taxpayers? The same group who are orchestrating kickbacks and undisclosed monetary support to ensure that "their people" are on the city council or in a position to push this group's agenda? It is laughable that you would accuse Bernie Talmas of bullying when the City of Woodinville staff and employees have a history of bullying co-workers, merchants and citizens who don't agree with city "policy".

HOW LONG HAVE YOU BEEN A RESIDENT? I've lived in Woodinville since 1980 and naively voted for incorporation. If I could retract my vote I would. At the time, a city seemed like a good alternative to King County. It didn't take long to prove that wrong. The first mayor of the city violated policy by not living within the city limits. Even though the mayor listed a business office as a residence, I seriously doubt if she slept on a cot in the office. What a joke! Did the mayor really think we were all that stupid? At the time most of us considered the mayor more of an honorary ombudsman than a political entity. Unfortunately that mayor's behavior set a precedent that is still in place 20 years later.

WE NEED TERM LIMITS! Mr. Hageman's term has exceeded his usefulness to the council and the city. He brings nothing to the discussion and at times it is painful to listen to him try to explain his position. It's interesting he contacted a former mayor about how to provide a document of residency while not actually living in Woodinville. Although "the group" wants to keep him on the council because he is a "YES" vote on their agenda items, he needs to give it up and move on. Seventeen years is too long to be in office. I was not moved by Mr. Hageman's "tearful public plea" at the Council meeting. Unfortunately when you decide to run for public office, you have to be tough enough to deal with challenging situations on both your personal and professional levels. If he had played by the rules and reported his change of address *within* Woodinville, he wouldn't have been subject to scrutiny.

THE LACK OF CIVILITY ON OUR CITY COUNCIL did not start with Bernie Talmas or Susan Boundy-Sanders. It has been an ongoing process. During the last election cycle, Councilmember Liz Aspen sent a letter to community concerning Al Taylor's candidacy. The letter was fraught with misinformation and in poor taste. The level of civility of Susan Boundy-Sanders' email directed to a *select* group of individuals pales in comparison to Ms. Aspen's letter that was sent to *all* the Woodinville registered voters. Ms. Aspen's letter closed with a campaign pitch for Scott Hageman and was in violation of state mandated use of campaign funds. Was there a public outcry for her violation? No. Her letter was highly inappropriate and intrusive. My understanding is that Councilmember Boundy-Sanders apologized for her remarks, but I never read or heard if Councilmember Aspen apologized to Mr. Taylor.

WOODINVILLE IS BECOMING A JOKE. When I tell people I live in Woodinville, I usually get a few remarks about all the "drama" and that maybe some of the council members are spending a little too much time in the "wine district". Resolution 436 outlined a process to remove the mayor from office and was proposed by a councilmember who doesn't intend to run again for office. ( Her personal agenda must have been successful.) And if I remember correctly the City Attorney advised the Council that no other municipality in state of Washington has such a process. Doesn't that seem a bit contrived on the part of some Council members? The amount of time and taxpayer dollars spent on drafting that resolution could have been better spent on items more essential to conducting city business.

BLOGS, FACEBOOK, TWITTER, ROBOCALLS, email, maligning letters all add to the lack of civility in our society. Being able to publicly voice our opinion has gone far beyond the Letter to the Editor column in the local paper. Instead of conversation, we hide behind these alternative methods. My comments are

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directed to you and don't need to be aired in the comment section of your blog or in a Letter to the Editor. I don't get any personal satisfaction from making my remarks public. Many of us don't have the need to see our name in print or our picture in the paper. We don't want to be bombarded with someone else's public remarks and opinions. If we want that information, we are capable of finding it on our own. I'm hoping that you will demonstrate some civility on your part by not "sharing your message" with me again.

"It has become appallingly obvious that our technology has exceeded our humanity." – Albert Einstein

Thank you –  
CB Allen, Woodinville, WA 98072

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Evidence 3.08: Postcard 1, August 29, 2013

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Woodinville voters have received three 6" x 11" postcards from Ethical Woodinville, on August 29, September 10, and September 24. Under the definitions in RCW 42.17A.005, all three appear to qualify as political advertising. In addition, the September 10 and 24 postcards fall into the time period that qualifies them as electioneering communications.

All three required expenditures for consultancy, stock photos, layout, printing, mailing list, mailing services, and postage.

All three fail to include required language naming sponsors and candidate involvement.

August 29 postcard (Evidence 3.08):

# Bullying at Woodinville City Hall

Ethical Woodinville  
14241 NE Woodinville-Duvall, PMB 156  
Woodinville, WA 98072

Print Std  
US Postage  
PAID  
IQ Direct  
98201

The Woodinville Weekly reported how Mayor Bernie Talmas tried to bully a fellow council member into resigning. (City Council meeting, Feb. 12, 2013)



Talmas claimed that he personally had access to the other councilman's private financial documents and remarked that his informant had been watching the

home of the man's wife and son late at night. (View video of Talmas' accusations at [www.EthicalWoodinville.com](http://www.EthicalWoodinville.com))

Any parent with children would find this disturbing. In a tearful public plea the Councilman said: "It makes me nervous to think that someone is watching my wife and son's home after dark when I am not around to protect them."

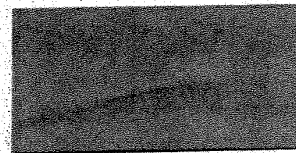
This kind of behavior is embarrassing to Woodinville. We should expect more from our Mayor and City Council.

Visit [www.EthicalWoodinville.com](http://www.EthicalWoodinville.com) or call 425-949-6752 for information on how to contact your Councilmembers.

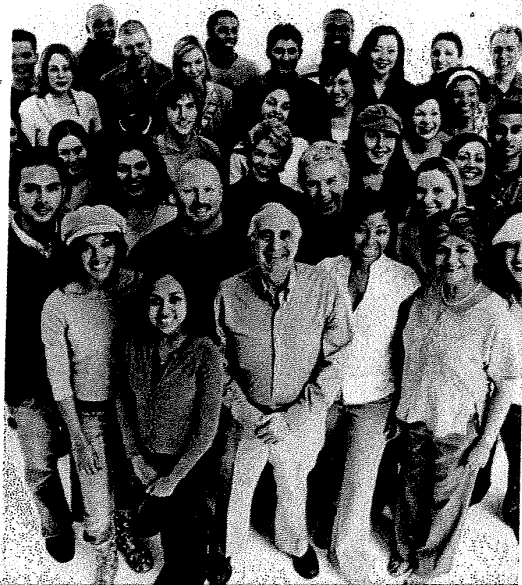
**Call Bernie Talmas** today at 425-489-2700

**Ask him to stop the bullying** and demand he vote yes on stricter ethics rules for Council conduct.

For more information visit: [EthicalWoodinville.com](http://EthicalWoodinville.com)



Take a stand against bullies.





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### Evidence 3.09: Postcard 2, September 10, 2013

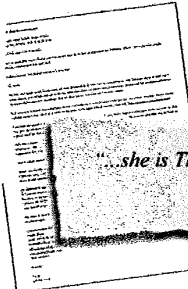
Bernie Talmas and Bounty-Sanders call citizens and other council members "bitch," "evil," and "mean cafeteria lady." *Seriously?*

EthicalWoodinville.com  
14241 NE Woodinville-Duwall, PMB 156  
Woodinville, WA 98072

Prsrt Std  
US Postage  
PAID  
Q Direct  
98201

received  
10 Sep 2013

On May 18, 2013, Councilmember Bounty-Sanders sent an email to a group of Talmas supporters about campaigning against another Councilmember. She said, "Bernie and I recruited heavily" to find an opponent. That's fine if that is how they want to spend their time.



But the email, which was apparently from both Talmas and Boundy-Sanders (using "we" and "us" throughout to refer to herself

*"...she is The Mean Cafeteria Lady".  
"She's the Evil Bitch-Queen..."*

and Talmas), referred to certain citizens that she and Talmas do not like as "bitch" and "evil" and "mean cafeteria lady." These are not words used by civil-minded public servants working for the good of the community. (Read the email at [www.EthicalWoodinville.com](http://www.EthicalWoodinville.com).)

Is this junior high School and it's all about them? Or are they our elected public servants working for Woodinville?

Call Bernie Talmas today at 425-489-2700 or email him at [citycouncil@ci.woodinville.wa.us](mailto:citycouncil@ci.woodinville.wa.us).  
  
Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct.



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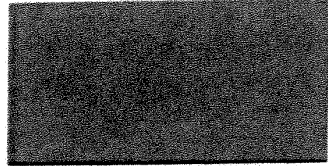
Public Disclosure Commission

### Evidence 3.10: Postcard 3, September 24, 2013

**Bernie Talmas' political operative harrassed a City Councilman, taking photos on his property when no one was home.**

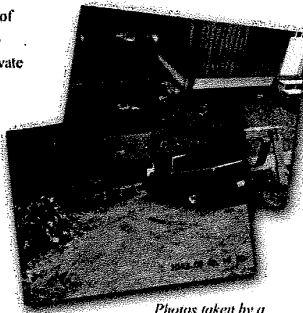
EthicalWoodinville.com  
14241 NE Woodinville-Duvall, PMB 166  
Woodinville, WA 98072

Prsrtd Std  
US Postage  
PAID  
IQ Direct  
98201



When Bernie Talmas failed to bully an opposing Councilmember into resigning, his people set out to harass him into submission.

On March 10, 2013, one of Talmas' agents went onto the Councilmember's private property.

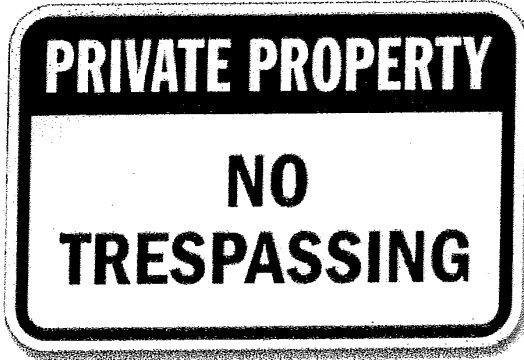


The man photographed what he claimed were "code violations" for repairs being made to the Councilmember's leased home.

The photos were sent to the Councilman in a threatening e-mail. Wouldn't this make any person feel like they were being stalked and their privacy violated?

*Photos taken by a Talmas agent while trespassing on another Councilman's property*

This...all because Bernie Talmas did not get his way. Because the Councilman refused to resign when Talmas told him to.  
*(View the e-mail & photos: www.EthicalWoodinville.com)*



Call Bernie Talmas today at 425-489-2700.  
Ask him to stop the bullying and demand he vote yes on stricter ethics rules for Council conduct.  
For more information visit: EthicalWoodinville.com

...yes, that means you, Bernie Talmas!

**Evidence 3.11: Mailing service has a confidentiality agreement with Ethical Woodinville's consultancy; USPS has no identity other than the mailing house for the bulk mailing payment**

The postcards from Ethical Woodinville display a bulk mailing indicia from IQ Direct.

Staffer Ted (Teng?) at the bulk mailing unit of the Everett USPS says their paperwork for the August 29 and September 10 postcards show only IQ Direct as the payer for the bulk mailings.

IQ Direct is a campaign and marketing firm and mailing service with (expired) business and corporate registrations showing Everett and Stanwood addresses.

At IQ direct, staffer Michelle states that they have a confidentiality agreement with the consultancy that represents Ethical Woodinville.

The information relevant to this complaint:

- Ethical Woodinville is making **expenditures** on a consultancy
- Ethical Woodinville and its consultancy are taking deliberate steps to hide their identity by operating under a **confidentiality agreement**.

Prsrt Std  
US Postage  
PAID  
IQ Direct  
98201

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**Washington State Department of Revenue  
State Business Records Database Detail**

TAX REGISTRATION NO: 601931512  
UBI: 601931512  
ENTITY NAME: PILOLLA GERALD J  
BUSINESS NAME: IQ DIRECT

ACCOUNT OPENED: 05/01/2008  
ACCOUNT CLOSED: 06/30/2011

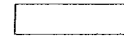
MAILING ADDRESS:  
2809 ROCKEFELLER AVE STE A  
EVERETT, WA 98201-3541

BUSINESS LOCATION:  
2809 ROCKEFELLER AVE STE A  
EVERETT, WA 98201-3541

ENTITY TYPE: SOLE PROPRIETOR

RESELLER PERMIT NO: N/A  
PERMIT EFFECTIVE: N/A  
PERMIT EXPIRES: N/A

NAICS CODE: 541860  
NAICS DEFINITION: DIRECT MAIL ADVERTISING



## Search Results

Viewing 1 - 1 of 1 results for "IQ Direct"

IQ DIRECT, INC.

[« Start New Search](#)

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All documents filed with the Corporations Division are considered public information.



Washin  
Cor  
801  
PO Box 4022  
E

## IQ DIRECT, INC.

[View Additional Information »](#)  
[Purchase Documents for this Corporation »](#)

UBI Number	602189905
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Inactive
State of Incorporation	WA
WA Filing Date	05/22/2002
Expiration Date	05/31/2003
Inactive Date	12/23/2002
Duration	Perpetual

## Registered Agent Information

Agent Name	GERALD J PILOLLA
Address	17914 92ND AVE NW
City	STANWOOD
State	WA
ZIP	98292

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### **Evidence 3.12: Private Mailbox**

The return address on the August 29 and September 10 postcards is a mailbox at Woodinville's UPS storefront. Rental of this mailbox requires a campaign **expenditure**.

Ethical Woodinville  
14241 NE Woodinville-Duvall, PMB 156  
Woodinville, WA 98072

Store staffer Joey tells us he is not permitted to disclose who rents any particular mailbox.  
425.486.6245.

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### Evidence 3.13: Letter to Editor, Sept. 2, 2013

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Ethical Woodinville published a letter to the editor in the September 2, 2013 Woodinville Weekly. This did not require an expenditure, but does appear to meet the RCW's definition of political advertising.

In a phone call with Mayor Bernie Talmas and in the September 9 edition of the newspaper, the Weekly's editor explained that she asked Ethical Woodinville to identify themselves, but they did not do so.

Although this letter to the editor was delivered to homes slightly ahead of the threshold for electioneering communications, it is **still published on the Woodinville Weekly's Web site and is still accruing hits**, so we believe that the online version has become an electioneering communication under the RCW definition.

URL:

[http://www.nwnnews.com/index.php?option=com\\_content&view=category&layout=blog&id=53&Itemid=74](http://www.nwnnews.com/index.php?option=com_content&view=category&layout=blog&id=53&Itemid=74)

### ***Letters to the Editor – Sept. 2, 2013***

#### *SOMEONE MUST BE THE ADULT IN THE ROOM*

*A recent letter-writer made accusations about Ethical Woodinville that require a response.*

*Ethical Woodinville is not a political action committee (PAC) as claimed. There has never been, nor will there ever be, any endorsement of any candidates for office.*

*Ethical Woodinville will never ask citizens to vote for or against any candidate.*

*Our mission is stated clearly in every phone call, mailer, or web post that is made public: we ask citizens to call the City Council and urge them to vote for stronger ethics rules for council behavior.*

*The embarrassing antics of Mayor Bernie Talmas and the political operatives and council members who work on his behalf must stop.*

*We are at the point that when someone with a different opinion speaks up, they are attacked personally and immediately.*

*It is no wonder why city board and commission vacancies go unfilled for months at a time.*

*Too many of the best and brightest in our city choose not to subject themselves to taking sides in a blood feud just to serve their community.*

*The citizens of Woodinville suffer as a result.*

*What is so wrong with stronger ethics rules to require council members to be civil? That is all we ask.*

*People of Woodinville: your mayor admitted at a public council meeting that he had an informant who had staked out the home of another council member late at night, then reported what he saw back to the mayor. Does this not bother anyone?*

*Why are they not working on downtown traffic?*

*Why do road-widening projects sit stagnant while these politicians snipe and peel skin off each other?*

*Someone must be the adult in the room and tell the kids to do their homework and stop the hair-pulling.*

*If that needs to be us, then so be it.*

*EthicalWoodinville.com*

*Read More*

*Hits: 167*

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### **Evidence 3.14: Editor's request for identity of "Ethical Woodinville" Sept. 9, 2013**

In a phone call with Mayor Bernie Talmas and in the September 9 edition of the newspaper, the Weekly's editor explained that she asked Ethical Woodinville to identify themselves before the Weekly published the September 2 letter, but they did not do so.

URL:

[http://www.nwnews.com/index.php?option=com\\_content&view=category&layout=blog&id=53&Itemid=74](http://www.nwnews.com/index.php?option=com_content&view=category&layout=blog&id=53&Itemid=74)

### ***Letters to the Editor - Sept. 9, 2013***

Ed. Note:

The running of the letter from Ethical Woodinville in the September 2 issue of The Woodinville Weekly was an error on my part as it has been and continues to be our policy not to publish anonymous letters unless there is an overwhelming reason to shield the writer's identity.

I still have not had a response from Ethical Woodinville concerning name(s) that could be used instead of just the name of the group.

I do apologize for the error.

*Karen Diefendorf, WW editor*

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## Evidence 3.99: Due diligence in attempting to identify "Ethical Woodinville"

The following list shows possible means of identifying the persons campaigning as "Ethical Woodinville" and our efforts to do so.

We have followed several leads to show due diligence in our efforts to identify the persons constituting the political committee.

The fact that our investigations always lead to dead ends—including confidentiality agreements and paid privacy services—indicates Ethical Woodinville's deliberate efforts to avoid identification.

### 3.99.1. Domain name Whois

Under the international rules that govern domain name registrations, a registrant must file contact information that is available to the public worldwide. About ten years ago, most domain name registrars began offering proxy services in which an inquiry would be directed to them, and they would forward the inquiry privately to the registrant. This service is always a for-fee profit center for domain name registrars, and the registrant must always opt in. The registrant of EthicalWoodinville.com has registered the domain name under the strongest proxy service in the industry, one that requires a court order for the registrar to divulge the name of the registrant.



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### 3.99.2. Robocalls origination and phone number provided in Web site

Witnesses who have caller ID report that the robocalls on August 8-9 and August 15, 2013, came from phone number 425.949.6752. This is the same phone number shown on the group's Web site EthicalWoodinville.com (forwards to EthicalWoodinville.blogspot.com).

Everyone who has telephoned the number has gone to voicemail. A reverse phone lookup yields no results:



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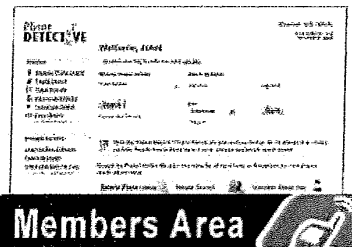
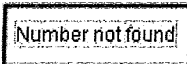
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### Congratulations, Your Order Is Complete

Your account has been created and payment received. Your bank statement will show a charge from "Clickbank". A receipt has also been sent to your email address.

- The full results for 425-949-6752 are listed below.
- We've upgraded your account to **30 days free membership**, which gives you access to unlimited people searches, basic phone lookups, and additional information about 425-949-6752. Click the "Members Area" button below to enter:



(opens in new window)

Unfortunately, we were unable to identify the owner of 425-949-6752. A majority of phones are found through our site - but some mobile/unlisted numbers are beyond the reach of any online database.

### 3.99.3. Email

Ethical Woodinville's Web site displays a contact email address, EthicalWoodinville@hotmail.com. Citizens who email receive a response, but the response evades direct questions by citizens for the persons to identify themselves. One such email is attached to this complaint.

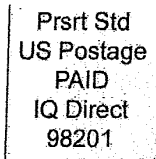
### 3.99.4. Bulk Mail Indicia

The two postcards received by Woodinville voters so far are mailed from Everett and display bulk mail indicia "IQ Direct 98021".

IQ Direct does exist -- it has a (expired) business registration (below), a Web site (IQDirect.com), and phone numbers.

A phone call to the Everett Post Office says that IQ Direct paid the bulk mailing postage for the two postcards.

An IQ Direct staff member, Michelle, states that they have a confidentiality agreement with the consultancy that Ethical Woodinville is using. She says that IQ Direct works with the consultancy and does not know who their client is.



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### Political Mailing Specialists

***Call BEFORE you Print!***

**Toll Free**

**☎ 1-800-830-6625**

**Local**

**☎ 360-652-4431**

**email**

**[marketing@iqdirect.com](mailto:marketing@iqdirect.com)**

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## Washington State Department of Revenue State Business Records Database Detail

TAX REGISTRATION NO: 601931512      ACCOUNT OPENED: 05/01/2008  
UBI: 601931512      ACCOUNT CLOSED: 06/30/2011  
ENTITY NAME: PILOLLA GERALD J  
BUSINESS NAME: IQ DIRECT

MAILING ADDRESS:      BUSINESS LOCATION:  
2809 ROCKEFELLER AVE STE A      2809 ROCKEFELLER AVE STE A  
EVERETT, WA 98201-3541      EVERETT, WA 98201-3541

ENTITY TYPE: SOLE PROPRIETOR      RESELLER PERMIT NO: N/A  
PERMIT EFFECTIVE: N/A  
NAICS CODE: 541860      PERMIT EXPIRES: N/A  
NAICS DEFINITION: DIRECT MAIL ADVERTISING

The screenshot shows a web browser window displaying the search results for "IQ Direct" on the Washington State Corporations website. The page includes a search bar, navigation links, and detailed information about the corporation, including its UBI number, category, and registered agent information.

**Search Results**  
Viewing 1 - 1 of 1 results for "IQ Direct"

**IQ DIRECT, INC.**

« Start New Search

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All documents filed with the Corporations Division are considered publi

**IQ DIRECT, INC.**

View Additional Information »  
Purchase Documents for this Corporation »

UBI Number	602189905
Category	REG
Profit/Nonprofit	Profit
Active/Inactive	Inactive
State of Incorporation	WA
WA Filing Date	05/22/2002
Expiration Date	05/31/2003
Inactive Date	12/23/2002
Duration	Perpetual

**Registered Agent Information**

Agent Name	GERALD J PILOLLA
Address	17914 92ND AVE NW
City	STANWOOD
State	WA
ZIP	98292

Washin. Cor 801 PO Box 4023

Facebook, Twitter, YouTube icons

SEARCH

Information Center, Nonprofits, Charities, Awards, Public Notices, Contact Us, FAQ

Done

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**3.99.5. Private post box**

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On its mailings, Ethical Woodinville provides a return address: 14241 NE Woodinville-Duvall Rd. PMB 156, Woodinville, WA, 98072. This is a UPS storefront that offers private post boxes. Store staffer Joey tells us he is not permitted to disclose who rents any particular mailbox. 425.486.6245.

Ethical Woodinville  
14241 NE Woodinville-Duvall, PMB 156  
Woodinville, WA 98072

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## Historical Context

Public Disclosure Commission

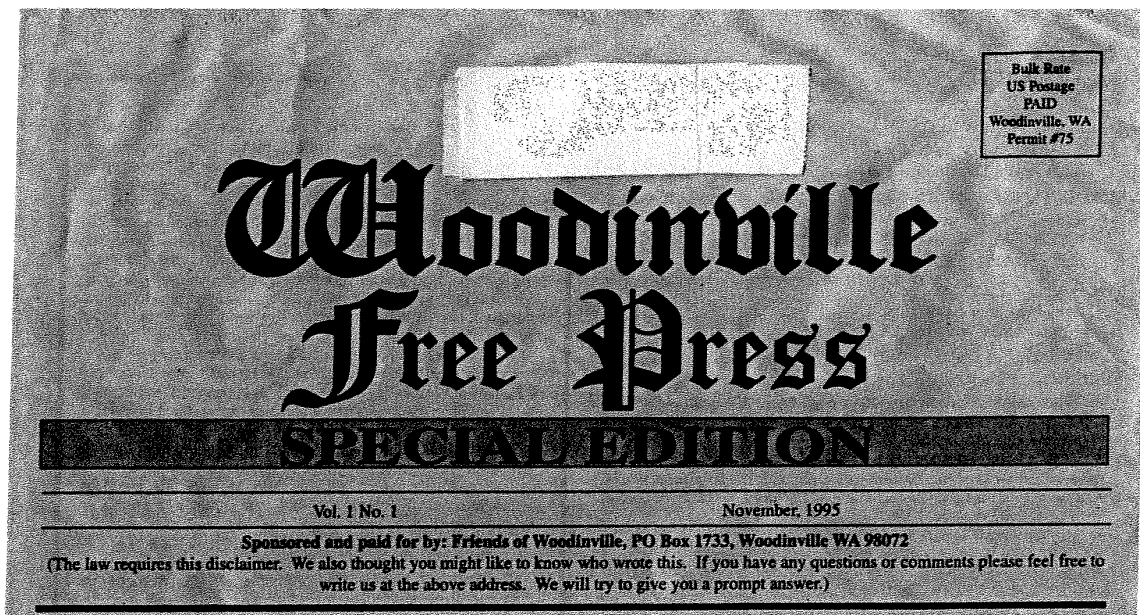
The reason it is so important to identify the individuals behind "Ethical Woodinville" is that anonymous campaign activities in Woodinville go back to 1995.

Under the principle that the past is the best predictor of the future, **we believe that by determining the persons behind Ethical Woodinville, the PDC will improve compliance with state campaign law in Woodinville, not only in 2013, but in future elections as well.**

Consistently, the anonymous activities support the same faction of Woodinville's candidates.

- Their 1995 election-season "newspaper"
- WoodinvilleBlog.com, a Web site that operated from 2006 to 2011.

We believe that their lack of activity in intervening years is simply explained: they held a strong majority on the Woodinville City Council.



**WHAT WE BELIEVE**

WoodinvilleBlog.com believes that informed citizens are essential to our democratic process and that truth and accuracy must never come in second to "politics."

As long as candidates have an ambition for elected office, it will be difficult to "out" candidates who are so determined to mislead voters.

A fundamental problem faced by voters is that they have neither the time nor the resources to examine the claims and promises to separate fact from fiction.

It is WoodinvilleBlog.com's hope that we can make a positive contribution to our community by providing credibility, perspective and insight into the issues that affect you.

**RECEIVED**

OCT -3 2013

Public Disclosure Commission

RECEIVED

OCT 11 2013

**PDC Complaint T14-025—Ethical Woodinville**

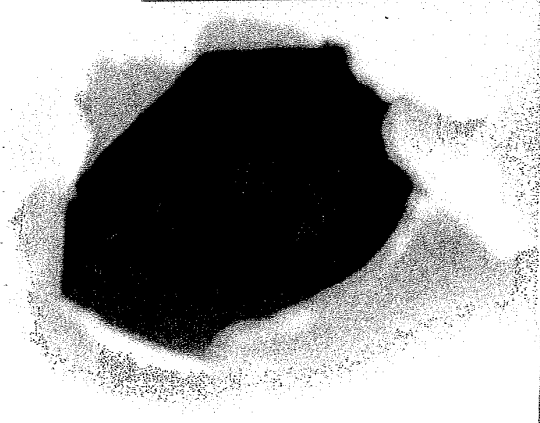
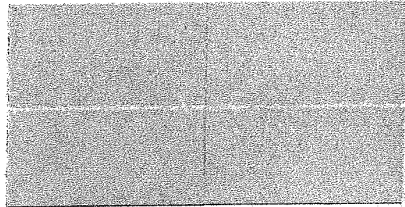
**Addendum 1: Postcard #4, received 8 October 2013**

Public Disclosure Commission

Woodinville voters received a fourth postcard from Ethical Woodinville on 8 October 2013:

EthicalWoodinville.com  
14241 NE Woodinville-Duvall, PMB 156  
Woodinville, WA 98072

Prsrt Std  
US Postage  
PAID  
IQ Direct  
98201



**Bernie Talmas** had an informant who  
**watched the home** of another  
Councilman late at night.

At the Feb. 12, 2013, City Council meeting,  
Mayor Bernie Talmas tried to bully a fellow  
Councilman into resigning on the spot.

In the heat of the debate, Talmas claimed that he  
had an informant who "saw you at that residence  
late at night."

This understandably left the Councilman with  
concern for his family's privacy. In a tearful public  
plea he responded: "It makes me nervous to  
think that someone is watching my wife and  
boy's home after dark when I am not  
around to protect them."

Do we elect a Peeping Tom or did we elect a City  
Councilman and Mayor?

How about fixing downtown traffic? What about  
discussing about widening projects that sit  
idle while Bernie Talmas picks fights with  
Councilmen?

Peeping  
Bernie.

Call Bernie Talmas today at 425-489-2700.

Ask him to stop the bullying  
and demand he vote yes on stricter ethics  
rules for Council conduct.

For more information visit: [EthicalWoodinville.com](http://EthicalWoodinville.com)

Please add this to Complaint T14-025

Thanks,

Susan Boundy-Sanders



RECEIVED

OCT 23 2013

Public Disclosure Commission

PDC Complaint T14-025—Ethical Woodinville

Addendum 2: Postcard #5, received 19 October 2013

Woodinville voters received a fifth postcard from Ethical Woodinville on 19 October 2013:

EthicalWoodinville.com  
14241 NE Woodinville-Duvall, PMB 156  
Woodinville, WA 98072

received 19 Oct 2013

Prsrtd Std  
US Postage  
PAID  
IQ Direct  
98201


# Bernie Talmas: a pattern of bullying



We need stronger  
ethics rules  
for Council conduct.

- Talmas demanded the resignation of another Councilman, citing information he learned from his informant who had been watching the man's home late at night. *(Feb. 12, 2013, City Council meeting)*
- A Talmas agent harassed a Councilman filing a legal allegation of fraudulent voter registration. *(March 4, 2013, ThePatch.com)*
- Letter to Talmas' supporters called citizens and opposing Council members "bitch" and "evil." *(May 18, 2013, letter)*
- Talmas operative trespassed onto private property to photograph Councilman's home and sent a threatening e-mail to City Hall. *(March 10, 2013, e-mail procured from City computers)*
- Following this pattern of harassment and bullying by Talmas, the City Council voted to draft stronger ethics rules governing Council behavior. Talmas voted no.

When the new, stronger ethics rules are drafted and come before the City Council for a final vote, Bernie Talmas and the City Council should vote yes. We need civility at Woodinville City Hall.

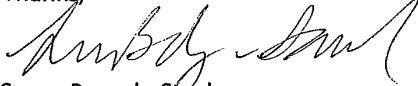


Call Bernie Talmas  
today at 425-489-2700  
and demand he vote yes on  
stricter ethics rules for Council conduct.

For more information visit: [EthicalWoodinville.com](http://EthicalWoodinville.com)

Please add this to Complaint T14-025

Thanks,

  
Susan Boundy-Sanders

# The Seattle Times

Winner of Nine Pulitzer Prizes

## Local News

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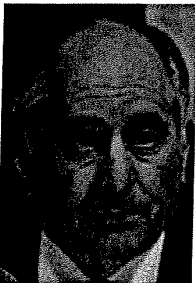
Originally published October 10, 2013 at 8:08 PM | Page modified October 10, 2013 at 8:20 PM

### Shadowy ads target Woodinville mayor, council member

Woodinville City Councilmember Susan Boundy-Sanders has filed a public-disclosure complaint over shadowy "Ethical Woodinville" ads attacking her and Mayor Bernie Talmas.

By Keith Ervin

Seattle Times staff reporter



Woodinville's mayor has become the target of attack ads as he campaigns for re-election to the City Council.

The ads — which call Mayor Bernie Talmas a bully and accuse him of using an informant — aren't sponsored by his election opponent or a registered political-action committee, but by a shadowy entity that isn't saying where it gets its funds.

It's the latest eruption of heated rhetoric involving members of the City Council, often directed by one member toward another.

Unpleasantness has included accusations of conflicts of interest, a challenge of a council member's residence in the city and an anonymous letter suggesting a member's mouth be sewn shut.

The council is considering a proposal under which members could be censured for insulting or slandering their colleagues.

Even as "Ethical Woodinville," the sponsor of recent ads attacking Talmas, calls for "stricter ethics

rules for Council conduct,” targets of the ads say the anonymous name-calling ignores voters’ right to know who is underwriting independent election expenditures.

Councilmember Susan Boundy-Sanders, a target of some of the ads, filed a complaint with the Public Disclosure Commission last week alleging the ad campaign violates multiple sections of the law.

A mailing received by voters Tuesday said Talmas “had an informant who watched the home of another Councilman late at night,” and labeled the mayor “Peeping Bernie.”

Boundy-Sanders gave the PDC recordings of two robocalls and copies of four mailings that refer voters to [www.EthicalWoodinville.com](http://www.EthicalWoodinville.com).

She said the city has a long history of anonymous political attacks, “always supporting the same slate of candidates, always nasty, deceitful, always with the claim, ‘Oh, we’re just your neighbors concerned about Woodinville’s future.’”

PDC spokeswoman Lori Anderson said she doesn’t expect commission staff to investigate the complaint before the Nov. 5 election because of the volume of other investigations under way.

The Public Disclosure Act requires that anyone spending \$1,000 or more on direct mail, newspaper or TV advertising that mentions a candidate’s name within 60 days of an election, report the source of the funds. Ethical Woodinville has submitted no reports to the PDC.

Talmas said the anonymous advertisers were making “deliberately false attacks on me” with the intention of swaying voters away from him and toward challenger Brad Walker.

But, he added: “I think most people are savvy enough to understand when they get this kind of attack from an anonymous group to take it with a grain of salt and not to pay attention to it.”

Walker said he and his campaign aren’t involved in Ethical Woodinville. “As to where my backers put money, I don’t know. I would hope not,” he said.

“I don’t feel it’s necessary; I don’t think it’s required; I don’t think it’s merited,” he said of the ad campaign.

An unidentified person answering a query to an email link on the Ethical Woodinville website said the group’s goal isn’t to sway the election.

“We do not advocate the election or defeat of any candidate. The election is irrelevant to this issue ...” the email said. “If and when the City Council passes stronger ethics rules governing council behavior we will stop pushing for stronger ethics in Woodinville.”

The writer of the email declined to provide his or her name, or to offer any information about the ad campaign’s financial backers.

Boundy-Sanders, who is running unopposed for re-election, said the mailings went to every household she has doorbelled. Assuming the mailings went to all voters, she estimated their cost at \$7,000, plus a consultant’s fee, and additional charges for robocalls.

An ad targeted Boundy-Sanders over an email she sent to political allies supporting another candidate and referring to Councilmember Liz Aspen as “The Mean Cafeteria Lady” and insulting former Mayor Lucy DeYoung.

That email led Aspen to complain about “cyberbullying” by council members and to propose a process for censuring those who do it.

“In the event that this occurs in the future, we need to have a formalized procedure to address it. That’s all I want,” Aspen said this week

In August, an anonymous letter was sent to council members with a needle, thread and handwritten message on a printout from the Ethical Woodinville website: "The simplest solution would be to sew shut Aspen's mouth."

Neither Aspen nor Police Chief Sydney Jackson saw the letter as a violent threat, but Aspen said it "was just stepping over the line."

Several Ethical Woodinville ads focus on Talmas' statement at a council meeting that he believed Councilmember Scott Hageman had moved out of the city and was no longer eligible to serve on the council.

Talmas told the council Hageman had bought a house in Kirkland and "it was reported to me that someone saw you at that residence" late at night. Hageman explained that his wife and son had moved into the Kirkland house, which he visited, but that he was living in a rented house in Woodinville.

Talmas said he wasn't involved in any spying, a claim he dismissed as "preposterous."

Hageman said he has nothing to do with the Ethical Woodinville ads and doesn't know who's behind them.

But, he said, "I know several people that have told me enough's enough already. Woodinville citizens, including at least a couple council members, actually are glad that somebody's finally shining the light in some of the dark places."

*Keith Ervin: 206-464-2105 or kervin@seattletimes.com*



**The Woodinville Weekly**  
**The Northlake News | The Valley View**  
*Community Newspapers Since 1976*

[Home](#) / [Local](#) / [News](#) / [Complaint filed against anonymous political group](#)

# COMPLAINT FILED AGAINST ANONYMOUS POLITICAL GROUP

14 Oct 2013 08:34 | Written by Briana Gerdeman, News Writer |

A group of 10 Woodinville citizens, including several City Council candidates, council members and others involved in local government, has filed a complaint saying the group Ethical Woodinville is breaking state law by anonymously advertising about political candidates.

The ads accuse Mayor Bernie Talmas of bullying and harassing other councilmembers and call him "Peeping Bernie."

Susan Boundy-Sanders, a current City Council member who's running unopposed for reelection, filed the complaint with the Washington State Public Disclosure Commission (PDC) on Oct. 1. She and the other witnesses on the complaint claim that Ethical Woodinville's anonymous website, phone calls and postcards criticizing Talmas are an unfair attempt to influence elections.

Ethical Woodinville's communications haven't specifically urged candidates to vote for or against a certain candidate; they've criticized Talmas, and sometimes Boundy-Sanders, then asked citizens to convince current council members to vote for stricter ethics rules. (Ethical Woodinville didn't respond to requests for comment.)

But Boundy-Sanders cites campaign disclosure laws in the Revised Code of Washington which hold that communications that identify a candidate and are distributed 60 days before an election are intended to influence voters. RCW also states, "Nondisclosure of financial information about advertising that masquerades as relating only to issues and not to candidate campaigns fosters corruption or the appearance of corruption."

"It's clear that this anonymous group is trying to affect the outcome of Woodinville elections," Boundy-Sanders wrote in a press release. "Washington campaign law gives people a great deal of freedom to say anything they want about candidates, including statements they know to be false, and Ethical Woodinville has made full use of that freedom. But the law also includes some requirements: They are required to identify themselves by name,

register with the PDC, and report their contributions and expenditures. Ethical Woodinville has failed to do these things."

She adds that Ethical Woodinville hasn't filed reports of its contributions and expenditures, as the law requires, and that the group is deliberately keeping its identity secret — for example, by using a proxy service to register its website.

"The layers of secrecy are clearly deliberate and comprehensive," she said. "The irony is that they're claiming to be advocating for ethics."

Boundy-Sanders said that Woodinville's history of anonymous communications during election season goes back to 1995, but Ethical Woodinville is "attacking more viciously and more frequently than ever before."

"They're always anonymous, they're always supporting Lucy DeYoung's group of candidates and attacking the people trying to run against them," Boundy-Sanders said. "...The funding for Bernie's opponent gives us a really clear insight into who has the motivation and the resources to take Bernie out."

DeYoung didn't respond to requests for an interview. Walker repeated that he's not involved with the anonymous group.

"I have no idea who Ethical Woodinville is or where they get their money from," Walker said, although he said people who donated to him could donate to other sources without his knowledge.

In addition to Boundy-Sanders, the witnesses on the complaint are: Candice Allen, Nancy Montgomery, Sharon Peterson, Art Pregler, Hank Stecker, Al Taylor, Peter Tountas, Paula Waters and Steve Yabroff. Although the group is trying to defend Talmas, Talmas himself is not a witness on the complaint, and he didn't return requests for comment. Boundy-Sanders said she filed the complaint, rather than Talmas, because "he has a campaign to run," and she has time.

Lori Anderson, media contact for the PDC, confirmed that the PDC has received the complaint, but it won't be reviewed until after the election since the PDC has to complete other investigations that are in progress.

The PDC staff will investigate the complaint, and the Director of Compliance will decide whether or not to file charges. If Ethical Woodinville is charged, the Commission will hear evidence from both Ethical Woodinville and the PDC staff who investigated. Ethical Woodinville could face a penalty of up to \$10,000 per violation (if multiple disclosures weren't filed or multiple parts of the law were violated.) The penalty depends on what information the public was deprived of, for how long, and how much money the group spent, Anderson said.

Comments or news tips? Contact Briana Gerdeman at [This email address is being protected from spambots. You need JavaScript enabled to view it..](mailto:blgerdeman@gmail.com)>blgerdeman@gmail.com.

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Home / Local / Letters to the Editor / Letters to the Editor - Sept. 2, 2013

## LETTERS TO THE EDITOR - SEPT. 2, 2013

03 Sep 2013 05:37 | Written by Readers |

### SOMEONE MUST BE THE ADULT IN THE ROOM

A recent letter-writer made accusations about Ethical Woodinville that require a response.

Ethical Woodinville is not a political action committee (PAC) as claimed. There has never been, nor will there ever be, any endorsement of any candidates for office.

Ethical Woodinville will never ask citizens to vote for or against any candidate.

Our mission is stated clearly in every phone call, mailer, or web post that is made public: we ask citizens to call the City Council and urge them to vote for stronger ethics rules for council behavior.

The embarrassing antics of Mayor Bernie Talmas and the political operatives and council members who work on his behalf must stop.

We are at the point that when someone with a different opinion speaks up, they are attacked personally and immediately.

It is no wonder why city board and commission vacancies go unfilled for months at a time.

Too many of the best and brightest in our city choose not to subject themselves to taking sides in a blood feud just to serve their community.

The citizens of Woodinville suffer as a result.

What is so wrong with stronger ethics rules to require council members to be civil? That is all we ask.

11/18/2014

Letters to the Editor - Sept. 2, 2013

People of Woodinville: your mayor admitted at a public council meeting that he had an informant who had staked out the home of another council member late at night, then reported what he saw back to the mayor. Does this not bother anyone?

Why are they not working on downtown traffic?

Why do road-widening projects sit stagnant while these politicians snipe and peel skin off each other?

Someone must be the adult in the room and tell the kids to do their homework and stop the hair-pulling.

If that needs to be us, then so be it.

*EthicalWoodinville.com*

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## The Woodinville Weekly

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[Home](#) / [Local](#) / [News](#) / Former mayor, as Ethical Woodinville, funded anonymous political advertising

# FORMER MAYOR, AS ETHICAL WOODINVILLE, FUNDED ANONYMOUS POLITICAL ADVERTISING

24 Mar 2014 06:32 | Written by Briana Gerdeman |

Anonymous postcards and phone calls criticizing Woodinville's mayor last election season, sent by a group called Ethical Woodinville, were paid for by another previous mayor, according to documents from the Public Disclosure Commission.

Lucy DeYoung, the city's first mayor, filed documents last month with the PDC showing that she spent more than \$12,000 on direct mail and phone calls criticizing Bernie Talmas and Susan Boundy-Sanders, who were running for reelection to the City Council last fall. DeYoung said she was the only person involved with Ethical Woodinville.

Boundy-Sanders, along with nine other witnesses, filed a PDC complaint against Ethical Woodinville last October, saying the group was breaking state law by anonymously advertising about political candidates.

"During the time that Mayor Talmas and I were candidates, state law and court decisions gave Ms. DeYoung wide latitude to criticize us, including criticisms that she knew to be untrue. She made lavish use of this freedom," Boundy-Sanders wrote in an email. "However, state law also required her to be open about her identity and her expenditures. Her failure to do so (in fact, strong evidence that she was deliberately hiding her identity) are what led me to file the original complaint with the PDC."

The PDC hasn't completed their investigation of the complaint yet, said Lori Anderson, communications and training officer for the PDC. Once PDC staff finishes investigating, they can choose whether to dismiss the complaint or file charges.

DeYoung says she sought advice from an attorney and a political consultant, who told her she didn't need to identify herself when she funded the phone calls, postcards and website. When the PDC asked her to disclose the information, she did.

"I was told the way I did it was the way to do it, that it was legal," she said. "...I never had any intention of doing anything illegal."

She says Ethical Woodinville's advertising was trying to influence legislative matters, not oppose specific candidates. Last fall and summer, the Council discussed adopting stronger ethics rules, and Ethical Woodinville's communications urged voters to demand the Council vote yes on stricter ethics rules. Advertising about issues, not candidates, doesn't require identifying the source of funding.

However, state law holds that electioneering communications that identify political candidates within 60 days of an election are intended to influence voters.

"Nondisclosure of financial information about advertising that masquerades as relating only to issues and not to candidate campaigns fosters corruption or the appearance of corruption," the law reads.

Boundy-Sanders said "it's inconceivable that Ms. DeYoung was ignorant of her responsibilities under state law to file with the PDC. She is politically active, and hired an attorney who is also an experienced political candidate to help her with the Ethical Woodinville campaign."

The postcards and phone calls focused on Talmas, who in February 2013, announced at a Council meeting that Councilmember Scott Hageman had purchased a house in Kirkland and that someone else was living in the Woodinville house at which Hageman was registered as a voter. Talmas suggested that Hageman might not be eligible to serve on the Council.

Ethical Woodinville's postcards call Talmas "Peeping Bernie" and imply he stalked another Councilmember and trespassed. Another postcard mentions an email in which Boundy-Sanders called DeYoung "The Evil Bitch-Queen" and Councilmember Liz Aspen a "Mean Cafeteria Lady."

"I think the public has a right to know how their elected officials act," DeYoung explained, saying that both Talmas and Boundy-Sanders are bullying constituents and Council members. "I think that bullying has reached a level in our society that is unacceptable," DeYoung added.

DeYoung says Talmas and Boundy-Sanders have made fun of pictures of her, have spread unfounded claims that her family made illegal land deals and have contacted Hageman's and Aspen's employers to disparage them. (Hageman and Aspen said that someone, but not Talmas or Boundy-Sanders, contacted their employers.)

"People in town have been followed, they get harassing phone calls. There's pervasive bullying that goes on in town," DeYoung said, attributing that bullying to Talmas and Boundy-Sanders' supporters. "In isolation, all of these things sound petty, but when they do it over and over, it's not petty," she said with emotion.

Talmas and Boundy-Sanders both denied DeYoung's accusations of bullying. Although they said they haven't contacted Council members' employers, both said DeYoung has tried to pressure a Councilmember through his employer.

Boundy-Sanders acknowledged she wrote the email, but apologized publicly for the things she called DeYoung and Aspen. Talmas said bringing up Hageman's residency was "the right thing to do."

"She's the one being investigated, not me," Talmas said of DeYoung. "She's trying to push this off on Susan and I."

He added that DeYoung could have brought up the issues of alleged bullying publicly, but chose not to do so, except through the anonymous Ethical Woodinville.

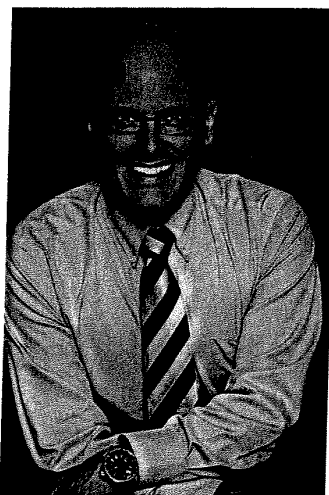


Home / Local / News /

City Council candidate Brad Walker wants to preserve city's unique 'look and feel'

# CITY COUNCIL CANDIDATE BRAD WALKER WANTS TO PRESERVE CITY'S UNIQUE 'LOOK AND FEEL'

07 Oct 2013 05:46 | Written by Briana Gerdeman, News Writer |



Brad Walker's priorities for Woodinville are simple: make Woodinville a livable city, without getting caught up in the "soap-opera-esque drama" of politics.

Walker, who's lived in Woodinville since 2006 and works for a commercial subcontractor doing business development, is running for position 7 on the City Council against incumbent Bernie Talmas.

Walker's experience in local government has been one year on the Parks and Recreation Commission.

That experience, he said, "ignited a desire to understand more about the city and government ... I love what [Woodinville] is and love what I feel like it's going to become."

... He wants to reduce traffic by improving infrastructure, bring more living options and local businesses to downtown, and create more community parks.

"I never want to take away the look and feel that I've grown to love," he said of Woodinville's mix of urban and rural atmosphere.

He also wants to "revitalize" Woodinville's industrial areas. Although he understand that the industrial district's low

rents have made it possible for wineries to open tasting rooms there, he'd like to allow restaurants and hotels in the industrial district as well.

"There's a certain beautiful essence to that gritty industrial feel," he acknowledged. "But at the same time, we can't just fill [visitors] up with wine and not give them a place to eat and a place to crash."

Walker elaborated on his positions on several topics the city has dealt with this year that may come up again in the future.

#### Vision of Downtown

Downtown Woodinville is "underdeveloped," Walker said. He wants to see more "craft" or "artisan" businesses, including restaurants and bakeries, and more affordable living options, such as apartments and condos.

"I'd love to see more energy in our downtown," Walker said, adding that he wants as many people to visit downtown at night as during the day.

He didn't express a strong opinion about some of the permitted uses in downtown that the Council amended this year, such as gas stations and car dealerships. He said he wouldn't immediately say no to a certain type of business, but he would want to make sure it blends in with the city. For a gun range, for example, that would mean not hearing it or smelling it, he said.

#### City Council Ethics

"Clearly, ethics are extremely important," he said of the council's discussion of adding rules to formally reprimand council members and remove the mayor and deputy mayor. "That being said, it seems like an incredible amount of time has been consumed ... It needs to be decided."

Walker said he agrees there's been behavior this year that merits a sanction — "where a council member poorly referenced a citizen of the area."

In January 2014, the council will decide whether or not to create procedures for removing the mayor and deputy mayor. Walker said he would support a procedure to remove the mayor and deputy mayor, but only with an absolute majority of the council voting for their removal.

"If something isn't working the way it's intended to work, there needs to be a fix," he said, citing the city of Pacific, Wash., in which the mayor "was destroying the town from within."

The anonymous website EthicalWoodinville.com has sprung up to — according to its own description — combat cyberbullying and promote civility in Woodinville's government.

"I have absolutely no involvement with that group or understanding of who they are," Walker said. He added that he understands why citizens are upset with the group, since he felt the group's last mailing was inappropriate for including a swear word.

#### Wellington Hills County Park

Walker lives in the West Wellington neighborhood, so the park that's been proposed at the site of Wellington Hills Golf Course would affect him directly. Snohomish County has planned a park with seven soccer fields that many residents of unincorporated Woodinville believe will bring more traffic than local roads can handle.

"I would like to see both sides working to come to the middle," Walker said.

Snohomish County is "dead set that this is going to be a regional sports complex," Walker said, but the area isn't suited to that. "I would very much love for that to become the community park that is it supposed to be ... a beautiful, usable, simple neighborhood park."

He wants the park to have fewer soccer fields and more facilities for other sports (such as baseball and tennis) and a larger play structure.

### Business License

Requiring a business license to gather information about businesses "seems like a sound program," Walker said. But "it's dangerous if you go outside of a flat fee," because he doesn't want to put pressure on large businesses.

He thinks a business license program should charge only enough to cover the costs of administration, with perhaps a bit extra, such as 5 percent more than the costs of administration, going toward expenditures that would help businesses, such as traffic, infrastructure repairs and marketing for the city.

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Home / Local / Letters to the Editor / Letters to the Editor - August 26, 2013

## LETTERS TO THE EDITOR - AUGUST 26, 2013

26 Aug 2013 05:58 | Written by Readers |

### A GUERRILLA GARDENER IN HOLLYWOOD HILL?

We have just moved to Woodinville (Hollywood Hill) around one month ago.

The house we bought had been a foreclosure and had been completely remodeled. I am guessing by the number of people who slow down outside it and stare, it must have been in a pretty dire state and judging by the Bing Maps pictures, it was in a pretty dilapidated state.

Anyway, in the last couple of days, someone has very kindly (and a little bit scarily) left a beautiful large bouquet of geraniums in one of the empty plant pots we've put outside the house.

We have no idea who it is – possibly a neighbor or someone else, which has led me to wonder if there is a guerilla gardener on the loose in the Woodinville Hollywood Hill area? It was a lovely gesture.

*Thanks & Kind Regards, James Whelan*

### PARKING PROBLEM IN WOODINVILLE

Dear retailers, restaurants and any others that rely on the public for their income:

Walking was hard, especially from the parking lot. Since I was so slow I had the time to look around and observe the parking in Woodinville. I was completely surprised by the overwhelming number of businesses that allow their employees to park as close as they can to the business's front door at the expense of the paying customers who have a hard time finding parking.

11/18/2014

Letters to the Editor - August 26, 2013

For some businesses, it's easy to spot employee cars as some have their store, restaurant, etc., name on the vehicle.

Others it's easy to tell as the closest spaces are taken way before the store is open.

Others, you can tell because the cars never move until shifts are over.

What does this show me?

The employee is more important than the customer who is shopping there, paying the salary and the money to keep the business open.

Parking is not really easy here.

Just to let you know how important I am as a customer and I will park accordingly — in front of your business or in front of a business in Bothell, Redmond or Kirkland.

*Kathryn E. Laine*

#### WHO ARE THEY?

By now, many Woodinville residents have received a call from an organization called Ethical Woodinville. What I found disturbing about this call and the organization's website is that there is no reference to who this organization represents.

I ask those involved with Ethical Woodinville to disclose who they are and engage in a civil discourse of how to improve the way City Council operates for the benefit of our city.

Further I hope that this is not the beginning of another negative election campaign and I hope the residents of Woodinville ignore anonymous websites like this one and will evaluate the candidates for what they have done for the City in the past, what they think the issues are for the future and how they will be addressed. Only then can voters make an intelligent decision on which candidate best matches their values and vision for Woodinville.

*Jim Dunlap, Woodinville,*

#### THANK YOU

The Celebrate Woodinville 2013 Concert Series and Festival are history and a great new tradition has been created in Woodinville. "It was an honor and pleasure to partner with the City of Woodinville and Woodinville Wine Country," said Woodinville Chamber of Commerce executive director, Dave Witt. "Working together, we successfully achieved our mission to bring Woodinville residents together for family-oriented events, encourage a sense of community, and promote Woodinville's wineries, breweries, local businesses, agriculture, and unique character to visitors from the Puget Sound Region."

Many organizations and individuals played a role in the success of these events. We extend our sincere appreciation to each of you.

RECEIVED

FEB - 6 2014

THE NORTH CREEK LAW FIRM  
A PROFESSIONAL CORPORATION

Public Disclosure Commission

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Mark C. Lamb  
[mark@northcreeklaw.com](mailto:mark@northcreeklaw.com)

February 6, 2014

*VIA ELECTRONIC EMAIL*

Mr. Kurt Young  
Compliance Officer  
Public Disclosure Commission  
711 Capitol Way Room 206  
P.O. Box 40908  
Olympia, WA 98507-0719

Re: Ethical Woodinville/Lucy DeYoung PDC Case No. 14-008

Dear Kurt,

I am in receipt of your letter of January 16, 2014. First, thank you for agreeing to an extension for this response until February 6, 2014. Second, this letter and the attached C6 report, is provided in response to your requests and at your direction. Third and finally, my client has ongoing efforts in the City of Woodinville to encourage the adoption of an ordinance to prevent bullying and abusive behavior on the Woodinville City Council. In your letter you indicated that an L6 form is not the proper way to disclose these activities; we would respectfully request guidance as to whether and how such ongoing issue advocacy activities should be reported to the PDC.

The following are answers to the specific queries raised in your letter of January 16, 2014 (the question from your letter is in bold, the answer following is in regular typeface):

1. **Who created Ethical Woodinville?** Lucy DeYoung.
2. **Who are Ethical Woodinville's officers, directors and principal decision-makers?** Ethical Woodinville represents a loose-knit group of like-minded

12900 NE 180<sup>th</sup> Street, Suite 235, Bothell, WA 98011  
Tel: (425) 368-4238 • Fax: (425) 489-2824



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- 2 -

February 6, 2014

Public Disclosure Commission

individuals who support an ordinance in the City of Woodinville to prevent bullying and abusive behavior on the Woodinville City Council.

3. **What type of entity is Ethical Woodinville? (i.e. is it incorporated)** Ethical Woodinville is not an incorporated entity, as described above it represents a loose-knit group of like-minded individuals who support an ordinance in the City of Woodinville to prevent bullying and abusive behavior on the Woodinville City Council.
4. **When was Ethical Woodinville created and for what purpose?** Ethical Woodinville was created in the first half of 2013 to advocate for the adoption of an ordinance in the City of Woodinville to prevent bullying and abusive behavior on the Woodinville City Council.
5. **Does Ethical Woodinville have a separate bank account from which it paid for the expenditures related to the postcards?** No, as described above Ethical Woodinville is not an incorporated or registered association so it could not obtain a bank account.
6. **What vendor did Ms. DeYoung (sic) use for the postcards?** Ethical Woodinville used Minnick and Minnick to create the postcards.
7. **Why did Ms. DeYoung not include her name on the postcards as the sponsor?** Ms. DeYoung, after consulting with the vendor and prior legal counsel, believed that Ethical Woodinville was the appropriate sponsor of issue advertising postcards that were not express advocacy relating to the election and defeat of a candidate. She has no objection to being associated with Ethical Woodinville or the ongoing efforts to pass an ordinance in the City of Woodinville to prevent bullying and abusive behavior on the Woodinville City Council.
8. **Were those costs included in the L-6 reports filed by Ethical Woodinville?**  
Yes.
9. **Did Minnick and Minnick provide those services for Ethical Woodinville?**  
Yes.

In conclusion, I hope this letter and the accompanying filings are responsive to your requests. I would respectfully note an omission from your letter, many of the communications sponsored by my client occurred either before or after the sixty day window provided in RCW 42.17A.005(19)(a). This is consistent with the reality that all of these communications are part of a consistent and ongoing issue advocacy campaign. I

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- 3 -

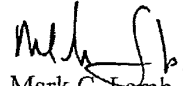
February 6, 2014

**Public Disclosure Commission**

look forward to your response and would encourage you to contact this office directly if you have any questions or require additional information. Thank you in advance for your consideration.

Sincerely,

THE NORTH CREEK LAW FIRM

  
Mark C. Lamb

MCL:ms



**PUBLIC DISCLOSURE COMMISSION**  
 711 CAPITOL WAY RM 206  
 PO BOX 40908  
 OLYMPIA WA 98504-0908  
 (360) 753-1111  
 TOLL FREE 1-877-601-2828

**GRASS ROOTS LOBBYING**

PDC FORM  
**L-6**  
 (1/02)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

JAN 10 2014

*COPY*

Sponsor's name  
 Ethical Woodinville  
 Address  
 14241 NE Woodinville-Duvall PMB 156  
 City Woodinville State WA Zip 98072 Telephone (425) 408-1820

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.

Stronger ethical rules for the City of Woodinville  
 City Concil Conduct

2. This report covers:

- Registration (Initial report)
- Monthly report From 8/1/13 To 8/31/13
- Final report (Campaign is ended)

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME	TITLE	ADDRESS
Lucy DeYoung	Founder	PO Box 5, Woodinville, WA 98072

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS	OCCUPATION OR BUSINESS	TERMS OF COMPENSATION
Minnick & Minnick 14751 N Kelsey St.Ste#105 Monroe, WA 98272 See Attached	Political Consultant	Independent Contractor

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)		\$ 0.00
2. Expenses this reporting period:	\$	
A. Radio		
B. Television		
C. Newspapers, magazines		
D. Brochures, signs		
E. Printing and mailing	6,570.30	
F. Consultants, public relations	1,430.86	
G. Office expense, travel, salaries	90.00	
H. Contributions		
I. Entertainment		
J. Other expenses	705.00	
3. Total expenditures this period (lines 2a-2j)		\$ 8,736.16
4. Total expenditures in the campaign (lines 1 + 3)		\$ 8,736.16

Continue On Reverse



Page 3

COPY

8/1/13-8/31/13

DATE FILED PDC

JAN 10 2014

Ethical Woodinville

4 Who is organizing or managing the campaign – continued

IQ Direct  
2809 Rockefeller Ave Ste A  
Everett, WA 98201

Mail House

*Independent Contractor*

Possinger Law Firm, PLLC  
PO Box 981  
Woodinville, WA 98072

Attorney

*Independent Contractor*

**GRASS ROOTS LOBBYING**

PDC FORM  
**L-6**  
 (1/02)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

JAN 10 2014

Sponsor's name  
 Ethical Woodinville  
 Address  
 14241 NE Woodinville-Duvall PMB 156  
 City State Zip Telephone  
 Woodinville WA 98072 (425) 408-1820

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.  
 Stronger ethical rules for the City of Woodinville  
 City Concil Conduct

2. This report covers:  
 Registration (Initial report)  
 Monthly report  
 From 9/11/13 To 9/30/13  
 Final report (Campaign is ended)

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME	TITLE	ADDRESS
Lucy DeYoung	Founder	PO Box 5, Woodinville, WA 98072

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS	OCCUPATION OR BUSINESS	TERMS OF COMPENSATION

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)		\$ 8,736.16
2. Expenses this reporting period:	\$	
A. Radio		
B. Television		
C. Newspapers, magazines		
D. Brochures, signs		
E. Printing and mailing		
F. Consultants, public relations	11,600.00	
G. Office expense, travel, salaries		
H. Contributions		
I. Entertainment		
J. Other expenses		
3. Total expenditures this period (lines 2a-2j)		\$ 11,600.00
4. Total expenditures in the campaign (lines 1 + 3)		\$ 20,336.16

Continue On Reverse





**PUBLIC DISCLOSURE COMMISSION**  
 711 CAPITOL WAY RM 206  
 PO BOX 40908  
 OLYMPIA WA 98504-0908  
 (360) 753-1111  
 TOLL FREE 1-877-601-2828

**GRASS ROOTS LOBBYING**

PDC FORM  
**L-6**  
 (1/02)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

JAN 10 2014

Sponsor's name  
 Ethical Woodinville  
 Address  
 14241 NE Woodinville-Duvall PMB 156  
 City Woodinville State WA Zip 98072 Telephone (425) 408-1820

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.  
 Stronger ethical rules for the City of Woodinville  
 City Conclil Conduct

2. This report covers:  
 Registration (Initial report)  
 Monthly report  
 From 10/1/13 to 10/31/13  
 Final report (Campaign is ended)

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME	TITLE	ADDRESS
Lucy DeYoung	Founder	PO Box 5, Woodinville, WA 98072

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS	OCCUPATION OR BUSINESS	TERMS OF COMPENSATION

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)		\$ 20,336.16
2. Expenses this reporting period:	\$	
A. Radio		
B. Television		
C. Newspapers, magazines		
D. Brochures, signs		
E. Printing and mailing		
F. Consultants, public relations		
G. Office expense, travel, salaries		
H. Contributions		
I. Entertainment		
J. Other expenses		
3. Total expenditures this period (lines 2a-2j)		\$ 0
4. Total expenditures in the campaign (lines 1 + 3)		\$ 20,336.16

Continue On Reverse



Sponsor's name  
Ethical Woodinville

This report covers:  
10/1/13 - 10/30/13

6. Contributions:

List each person or organization who has contributed \$25 or more during this report period

NAME	ADDRESS, CITY, ZIP	AMOUNT
Lucy DeYoung	PO Box 5 Woodinville, WA 98072	\$ 0

COPY

List Total Amount From Any Attached Pages .....	\$ 0.00
Total Amount Received In Contributions Less Than \$25 Where Contributor's Name Is Not Listed .....	0.00
Total Contributions This Period .....	0
Total Contributions During The Campaign .....	20,336.16

CERTIFICATION: I hereby certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.

Name and title Lucy DeYoung, Founder	Signature <i>Lucy DeYoung</i>	Date 1/10/14
---	----------------------------------	-----------------

INSTRUCTIONS

WHO SHOULD FILE THIS FORM: Any person making grass roots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee exceeding \$1,000 in the aggregate in any three month period or exceeding \$500 in the aggregate in any one month in presenting a program addressed to the public, a substantial portion of which is intended, designed, or calculated primarily to influence state legislation.

FILING DEADLINE: Within 30 days after becoming a sponsor of a grass roots lobbying campaign. Thereafter, sponsors file monthly reports on the 10th of the month covering the preceding calendar month. Termination notice is to accompany the final monthly report.

SEND REPORT TO:  
Public Disclosure Commission  
711 Capitol Way, Rm 206  
PO Box 40908  
Olympia, WA 98504-0908

QUESTIONS: CALL (360) 753-1111, OR TOLL FREE 1-877-601-2828



**PUBLIC DISCLOSURE COMMISSION**  
 711 CAPITOL WAY RM 206  
 PO BOX 40908  
 OLYMPIA WA 98504-0908  
 (360) 753-1111  
 TOLL FREE 1-877-601-2828

**GRASS ROOTS LOBBYING**

PDC FORM  
**L-6**  
 (1/02)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

JAN 10 2014

Sponsor's name  
 Ethical Woodinville  
 Address  
 14241 NE Woodinville-Duvall PMB 156  
 City Woodinville State WA Zip 98072 Telephone (425) 408-1820

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.

Stronger ethical rules for the City of Woodinville  
 City Conclil Conduct

2. This report covers:

- Registration (Initial report)
- Monthly report  
 From 11/1/13 to 11/30/13
- Final report (Campaign is ended)

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME	TITLE	ADDRESS
Lucy DeYoung	Founder	PO Box 5, Woodinville, WA 98072

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS	OCCUPATION OR BUSINESS	TERMS OF COMPENSATION

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)

\$ 20,336.16

2. Expenses this reporting period:

\$ \_\_\_\_\_

A. Radio

\_\_\_\_\_

B. Television

\_\_\_\_\_

C. Newspapers, magazines

\_\_\_\_\_

D. Brochures, signs

\_\_\_\_\_

E. Printing and mailing

\_\_\_\_\_

F. Consultants, public relations

\_\_\_\_\_

G. Office expense, travel, salaries

\_\_\_\_\_

H. Contributions

\_\_\_\_\_

I. Entertainment

\_\_\_\_\_

J. Other expenses

\_\_\_\_\_

3. Total expenditures this period (lines 2a-2j)

\$ 0

4. Total expenditures in the campaign (lines 1 + 3)

\$ 20,336.16

Continue On Reverse

Sponsor's name  
Ethical Woodinville

JAN 10 2014

This report covers:

6. Contributions:

List each person or organization who has contributed \$25 or more during this report period

NAME	ADDRESS, CITY, ZIP	AMOUNT
Lucy DeYoung	PO Box 5 Woodinville, WA 98072	\$ 0

List Total Amount From Any Attached Pages .....	\$ 0.00
Total Amount Received In Contributions Less Than \$25 Where Contributor's Name Is Not Listed .....	0.00
Total Contributions This Period .....	0
Total Contributions During The Campaign .....	\$20,336.16

CERTIFICATION: I hereby certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.

Name and title Lucy DeYoung, Founder	Signature 	Date 1/10/14
---	---	-----------------

**INSTRUCTIONS**

**WHO SHOULD FILE THIS FORM:** Any person making grass roots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee exceeding \$1,000 in the aggregate in any three month period or exceeding \$500 in the aggregate in any one month in presenting a program addressed to the public, a substantial portion of which is intended, designed, or calculated primarily to influence state legislation.

**FILING DEADLINE:** Within 30 days after becoming a sponsor of a grass roots lobbying campaign. Thereafter, sponsors file monthly reports on the 10th of the month covering the preceding calendar month. Termination notice is to accompany the final monthly report.

**SEND REPORT TO:**  
Public Disclosure Commission  
711 Capitol Way, Rm 206  
PO Box 40908  
Olympia, WA 98504-0908

**QUESTIONS:** CALL (360) 753-1111, OR TOLL FREE 1-877-601-2828

**GRASS ROOTS  
 LOBBYING**

PDC FORM  
**L-6**  
 (1/02)

THIS SPACE FOR OFFICE USE  
 DATE FILED PDC  
 JAN 10 2014

Sponsor's name  
 Ethical Woodinville  
 Address  
 14241 NE Woodinville-Duvall PMB 156  
 City Woodinville State WA Zip 98072 Telephone (425) 408-1820

1. Describe the topic(s) or legislation about which the campaign is conducted. Include bill, rule, rate, standard number, if any.  
 Stronger ethical rules for the City of Woodinville  
 City Concil Conduct

2. This report covers:  
 Registration (Initial report)  
 Monthly report  
 From 12/1/13 to 12/31/13  
 Final report (Campaign is ended)

3. List the principal officers of the group or organization if the sponsor is a business, union, association, political organization or other entity.

NAME	TITLE	ADDRESS
Lucy DeYoung	Founder	PO Box 5, Woodinville, WA 98072

4. Who is organizing or managing the campaign? List persons or firms hired to assist in the campaign, including public relations and advertising agents.

NAME AND ADDRESS	OCCUPATION OR BUSINESS	TERMS OF COMPENSATION

5. Expenditures Made Or Incurred In The Campaign:

1. Previous expenditures (from line 4, last L-6 report)		\$ 20,336.16
2. Expenses this reporting period:	\$	
A. Radio		
B. Television		
C. Newspapers, magazines		
D. Brochures, signs		
E. Printing and mailing		
F. Consultants, public relations		
G. Office expense, travel, salaries		
H. Contributions		
I. Entertainment		
J. Other expenses		
3. Total expenditures this period (lines 2a-2j)		\$ 0
4. Total expenditures in the campaign (lines 1 + 3)		\$ 20,336.16

Continue On Reverse



**RECEIVED**

FEB 10 2014

**DATE FILED PDC**

FEB -7 2014

**To: PDC**

Public Disclosure Commission

**From: Ethical Woodinville**

**Date: February 7, 2014**

COPIES

The enclosed C6 is being filed via US Mail at the request and direction of PDC staff. Ethical Woodinville previously filed an L6 on January 10, 2014 but was advised by PDC staff that (outside of the 60 days prior to an election) reports of its activities are not required by law. PDC staff advised that the enclosed C6 would be the appropriate way to report activities of Ethical Woodinville in the 60 days prior to city council elections.



COPY

Form <b>C6</b> 1/12	DATE FILED PDC  FEB - 7 2014
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Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES (Occurring at any time) — \$100 or more  
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — \$1,000 or more  
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — \$1,000 or more

1. Name and complete postal mailing address of sponsor:  ETHICAL WOODINVILLE/LUCY DeYoung 20205 144 <sup>th</sup> AVENUE WOODINVILLE, WA 98072	E-mail EthicalWoodinville@gmail.com Telephone 425-949-6752
--	---

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
8-15-13	9-9-13	Minnick AND Minnick	Direct MAIL	\$ 2935.05
8-15-13	9-23-13	Minnick AND Minnick	Direct MAIL	\$ 2935.05
8-15-13	10-7-13	Minnick AND Minnick	Direct MAIL	\$ 2935.05
8-15-13	10-18-13	Minnick AND Minnick	Direct MAIL	\$ 2935.05
8-3-13	10-21-13	Minnick AND Minnick 14751 N. Kelsey # 105 PMB # 116 Morse, WA 98272	Phone Calls	\$ 297.50
Expenditures \$100 or less not itemized above				\$ 0
Total this report				\$ 12,037.70
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.				Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports. \$ 12,037.70

3. List of candidate(s) or ballot proposition(s) identified in the advertising.				Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose		
Susan Boudry-Sanders	WOODINVILLE CITY COUNCIL (N.P)		<input type="checkbox"/> <input type="checkbox"/>	\$ 2935.05	\$ 2935.05
Bernie Talmas	"	"	<input type="checkbox"/> <input type="checkbox"/>	\$ 12,037.50	\$ 12,037.50
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
Continued on attached sheet <input type="checkbox"/>				\$	\$

COPY

FEB - 7 2014

Filer Name:

4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:

- a)  An individual using only personal funds.
- b)  An individual using personal funds and/or funds received from others.
- c)  A business, union, group, association, organization, or other person using only general treasury funds.
- d)  A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e)  A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f)  A political committee filing C-5 reports. (RCW 42.17A.250)
- g)  Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

5. Sources giving in excess of \$250 for the electioneering communication:

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	\$
			\$
		Occupation	\$
			\$
		Occupation	\$
			\$
		Occupation	\$
			\$
		Occupation	\$
		Sub-Total	\$
		Amount from attached pages	\$
		TOTAL FUNDS RECEIVED	\$

Continued on attached sheet

TOTAL FUNDS RECEIVED

**Sponsor of Independent Expenditure or Electioneering Communication**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.

Signature <i>Lucy DeYoung</i>	Printed Name Lucy DeYoung
Street address P.O. Box 5	
City/State/Zip Woodinville, WA 98072	
Date Signed 2/6/2014	Place Signed (city and county) Woodinville WA King

\*RCW 9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."





Reporting Form for: (check one) **Instructions on Page 3**

- INDEPENDENT EXPENDITURES** (Occurring at any time) — \$100 or more  
 **INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — \$1,000 or more  
 **ELECTIONEERING COMMUNICATIONS**, Except Contributions (Appearing within 60 days of an election) — \$1,000 or more

<b>1. Name and complete postal mailing address of sponsor:</b> ETHICAL WOODINVILLE 20205 144TH AVE NE, SUITE 900 WOODINVILLE, WA 98072	E-mail <b>ETHICALWOODINVILLE@</b> <hr/> Telephone <b>425-949-6752</b>
---	--

**2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.**

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
08/15/13	09/09/13	MINNICK & MINNICK 14751 NORTH KELSEY #105 MONROE, WA 98272	DIRECT MAIL	2,935.05
08/15/13	09/23/13	MINNICK & MINNICK 14751 NORTH KELSEY #105 MONROE, WA 98272	DIRECT MAIL	2,935.05
08/15/13	10/07/13	MINNICK & MINNICK 14751 NORTH KELSEY #105 MONROE, WA 98272	DIRECT MAIL	2,935.05
08/15/13	10/18/13	MINNICK & MINNICK 14751 NORTH KELSEY #105 MONROE, WA 98272	DIRECT MAIL	2,935.05
Expenditures \$100 or less not itemized above				\$ 0.00
<b>Total this report</b>				\$ 12,037.70
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.				<b>Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.</b> \$ 12,037.70

3. List of candidate(s) or ballot proposition(s) identified in the advertising.				Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose		
ALMAS, BERNIE	CITY COUNCIL MEMBER/CITY OF WOODINVILLE	NON PARTISAN	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose	\$ 12,037.70	\$ 12,037.70
			<input type="checkbox"/> Support <input type="checkbox"/> Oppose	\$	\$
			<input type="checkbox"/> Support <input type="checkbox"/> Oppose	\$	\$
			<input type="checkbox"/> Support <input type="checkbox"/> Oppose	\$	\$

Continued on attached sheet

Filer Name:

**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a)  An individual using only personal funds.
- b)  An individual using personal funds and/or funds received from others.
- c)  A business, union, group, association, organization, or other person using only general treasury funds.
- d)  A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e)  A political committee filing C-3 and C-4 reports. (RCW 42.17A.205 - .240)
- f)  A political committee filing C-5 reports. (RCW 42.17A.250)
- g)  Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		<b>TOTAL FUNDS RECEIVED</b>	\$ 0.00

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17A.005. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	Printed Name
		LUCY DEYOUNG
	Street address	
	20205 144TH AVE NE, SUITE 900	
	City/State/Zip	
WOODINVILLE WA 98072		
Date Signed	Place Signed (city and county)	
03/04/14	WOODINVILLE KING	
*RCW 9A 72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."		

# C6 Continuation Page

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value
08/03/13	10/21/13	MINNICK & MINNICK 14751 NORTH KELSEY #105 MONROE, WA 98272	PHONE CALLS	297.50

RECEIVED

OCT 16 2009

Public Disclosure  
Commission

FAX COVER SHEET

DeYOUNG FAMILY LLC II  
POB 863  
WOODINVILLE, WA 98072  
425.885.1771  
425.702.1941 - FAX  
206.356.6852 - Mobile

To: PDC

Company:

FAX Number: 360.753.1112

From: Lucy DeYoung

Re: Independent Expenditure

Date: Oct 16, 09

Pages: Cover + 1

Any questions please call  
Lucy DeYoung 425.885.1771  
or  
lucydeyoung@isomedia.com

If there are any problems with this Fax please call 425.885.1771



Form **C6** 5/06  
**RECEIVED**  
 OCT 16 2009  
 Public Disclosure Commission

Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES** (Occurring at any time) — \$100 or more
- INDEPENDENT EXPENDITURE ADS** (Appearing within 21 days of an election) — \$1,000 or more
- ELECTIONEERING COMMUNICATIONS, Except Contributions** (Appearing within 60 days of an election) — \$5,000 or more

1. Name and complete postal mailing address of sponsor:  
 Al DeYoung Woodinville, WA 98072  
 P.O. Box 863  
 E-mail: lucydeyoung@iso-media.com  
 Telephone: 425-486-9731

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
10/7/09	10/15/09	Labels & Lists 2500 - 116th Avenue Bellevue, WA 98004	Labels	739.36
10/7/09	10/15/09	JR Mailing 2120 116th Ave NE #3 Bellevue, WA 98004	Mailing + postage	9,050.64
10/16/09	10/15/09	Capital City Press 2975 37th Ave SW Tumwater, WA 98512	Printing	4,747.10
Expenditures \$100 or less not itemized above				\$ 535.00
Total this report				\$ 15,072.10
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.				Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports. \$ 15,072.10

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Charles Pickler	KPHD # 2	NP	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$	\$ 15,072.10
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Continued on attached sheet

Reporting Form for: (check one)

Instructions on Page 3

- INDEPENDENT EXPENDITURES (Occurring at any time) — \$100 or more  
 INDEPENDENT EXPENDITURE ADS (Appearing within 21 days of an election) — \$1,000 or more  
 ELECTIONEERING COMMUNICATIONS, Except Contributions (Appearing within 60 days of an election) — \$5,000 or more

1. Name and complete postal mailing address of sponsor:

DeYoung, Al  
 PO Box 863  
 Woodinville, WA 98072

E-mail: lucydeyoung@isomedi  
 Telephone: 425-486-9731

2. Itemize expenditures of more than \$100 associated with the independent expenditure or electioneering communication.

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
.0/07/09	10/15/09	Labels and Lists 2500 116th Ave NE Bellevue, WA 98004	Labels	739.36
.0/07/09	10/15/09	JR Mailing 2120 116th Ave NE #3 Bellevue, WA 98004	Mailing and Postage	9,050.64
.0/16/09	10/15/09	Capitol City Press 2975 37th Ave SW Tumwater, WA 98512	Printing	4,747.10
.0/10/09	10/15/09	Corbenic Group 2223 Summit LakeShore Road NW Olympia, WA 98052	Layout	535.60
Expenditures \$100 or less not itemized above				\$ 0.00

<b>Amount or Value</b>	Total this report	\$ 15,072.70
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 15,072.70

3. List of candidate(s) or ballot proposition(s) identified in the advertising.

Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose	Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
ILCHER, CHARLES	HOSPITAL COMMISSIONER/KING CO HOSP DIST 2 KIRKLAND	NON PARTIS	<input checked="" type="checkbox"/> <input type="checkbox"/>	\$ 15,072.10	\$ 15,072.10
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$
			<input type="checkbox"/> <input type="checkbox"/>	\$	\$

Continued on attached sheet

**Filer Name:**

**4. If reporting an Electioneering Communication, it is necessary to disclose information concerning the source of funding for the communication. Select the description that applies:**

- a)  An individual using only personal funds.
- b)  An individual using personal funds and/or funds received from others.
- c)  A business, union, group, association, organization, or other person using only general treasury funds.
- d)  A business, union, group, association, organization, or other person using general treasury funds and/or funds received from others.
- e)  A political committee filing C-3 and C-4 reports. (RCW 42.17.040 - .090)
- f)  A political committee filing C-5 reports. (RCW 42.17.093)
- g)  Other

If (b), (d), (f), or (g) applies, complete section 5 below. If (e) applies, also complete section 5 if the committee received funds that were requested or designated for the communication.

**5. Sources giving in excess of \$250 for the electioneering communication:**

Date Received	Source's Name, Address, City, State, Zip	For individuals, Employer's Name, City and State	Amount
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
			\$
		Occupation	
		Sub-Total	\$ 0.00
	Continued on attached sheet <input type="checkbox"/>	Amount from attached pages	\$ 0.00
		<b>TOTAL FUNDS RECEIVED</b>	<b>\$ 0.00</b>

Sponsor of Independent Expenditure or Electioneering Communication		
I certify (or declare) under penalty of perjury under the laws of the State of Washington that this expenditure was not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate's authorized committee, or an agent of a candidate nor does it otherwise constitute a contribution under RCW 42.17.020. I further certify that the above information is true, complete, and correct to the best of my knowledge.	Signature	
	Printed Name <b>Al DeYoung</b>	
	Street address <b>PO Box 863</b>	
	City/State/Zip <b>Woodinville WA 98072</b>	
	Date Signed <b>10/16/09</b>	Place Signed (city and county) <b>Woodinville King</b>
	*RCW9A.72.040 provides that "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."	