



STATE OF WASHINGTON  
**PUBLIC DISCLOSURE COMMISSION**

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TO: Commissioners

FROM: Tony Perkins, Director of Compliance

DATE: October 15, 2015

SUBJECT: Gina Tveit, Case No. 15-045

This case involves alleged violations by Gina Tveit, a candidate for Stevens County District Court Judge of: (1) failing to timely file a Candidate Registration within two weeks of receiving an in-kind contribution; (2) failing to timely file a C-3 report, C-4 reports, and orders placed; (3) accepting an in-kind contribution that exceeded contribution limits; and (4) failing to file contribution and expenditure reports using the required electronic method.

You are being provided the following documents:

1. Amended Notice of Administrative Charges;
2. Report of Investigation with Exhibits;
3. Addendum to Report of Investigation with Exhibits;
4. Stipulation as to Facts (October 13, 2015);
5. PDC Staff Witness List and Exhibits (August 19, 2015); and
6. Comparable Past Enforcement Cases



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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action  
Against

Gina Tveit

Respondent.

PDC Case No. 15-045

Notice of Administrative Charges  
(Amended June 16, 2015)

**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. PDC staff alleges that Gina Tveit, a 2014 Stevens County District Court Judge, violated RCW 42.17A as follows:
  - 1) RCW 42.17A.205 by failing to timely file a Candidate Registration (C-1 report) within two weeks of becoming a candidate, after receiving the benefit of an in-kind contribution for opposition research (100 days late);
  - 2) RCW 42.17A.235, and .240 by failing to timely file the June 2014 C-4 report, with expenditures totaling \$6,551 (32 days late); by failing to timely file a C-3 report disclosing a \$24,791 contribution from the candidate (119 days late); by failing to timely file C-4 reports of Contributions and Expenditures disclosing

\$24,791 in expenditures (54–97 days late); and a \$4,500 in-kind contribution at least 265 days late); and by failing to report orders placed totaling \$22,113 (111 days late);

- 3) RCW 42.17.405 by accepting an in-kind contribution that exceeded contribution limits by \$2,600; and
- 4) RCW 42.17A.245 by failing to file contribution and expenditure reports using the required electronic method.

### **III. FACTS**

3. Ms. Tveit was elected Stevens County District Court Judge in the November 2, 2010 general election. On May 24, 2014, Ms. Tveit filed a C-1 report registering her candidacy for re-election in 2014. Ms. Tveit was elected Stevens County District Court Judge in the November 4, 2014 general election.
4. Gary Ghramm, Ms. Tveit's father, engaged the services of Ted Pulver, a private investigator, to investigate Michael Clay, Ms. Tveit's 2014 opponent, sometime in January 2014. Ms. Tveit acknowledged that her father would not have engaged Mr. Pulver's services, except for the fact that Mr. Clay was a potential candidate for Stevens County District Court Judge.
5. Ms. Tveit was aware of her father's activities, and was therefore required to file a C-1, registering her candidacy, within two weeks of the date she was informed of his activities, or by no later than February 13, 2014. She filed a candidate registration 100 days late on May 24, 2014.
6. The value of Mr. Ghramm's in-kind contribution was \$4,500. Because the contribution limit to Ms. Tveit's campaign was \$1,900 per election, Ms. Tveit accepted an over-limit in-kind contribution in the amount of \$2,600.

7. The Campaign received monetary and in-kind contributions totaling \$46,679, with an equal amount of expenditures. Of this amount, Ms. Tveit contributed \$40,207 in personal funds which represented 86.5 percent of all contributions received.
8. The Campaign filed its June 2014 C-4 report, due July 10, 2014, 32 days late, on August 11, 2014. The report included expenditures totaling \$6,551, of which \$6,182 was for political advertising materials.
9. The Campaign failed to timely file a C-3 report disclosing the receipt of \$24,791 in personal funds from Ms. Tveit on October 1, 2014. The Campaign was required to file a C-3 report disclosing receipt of this contribution by October 6, 2014, but did not report receipt of the contribution until February 2, 2015, 119 days late and nearly three months after the 2014 general election. The late-reported contribution represented 53.1 percent of all contributions received by the Campaign.
10. The Campaign failed to file its 7-day Pre-General election C-4 report, which was due by October 28, 2014, and its Post-General election C-4 report, which was due by December 10, 2014, until February 2, 2015. The report covered the period October 14 through December 10, 2014, and disclosed previously unreported activities undertaken by the Campaign prior to the election. The 7-day C-4 report was filed 97 days late, and the Post-General election C-4 report was filed 54 days late. The late reported activities included:
  - 1) \$24,791 monetary contribution from Ms. Tveit's personal funds;
  - 2) \$24,791 in campaign expenditures for political advertising that included direct mail pieces, newspaper advertisements, and an ad/telephone poll. These expenditures were reported 97 days late;
  - 3) \$4,500 in-kind contribution received from Mr. Ghramm, Ms. Tveit's father, for the cost of hiring a private investigator to investigate Mr. Clay. This contribution was reported at least 265 days late; and
  - 4) \$2,600 in outstanding debts or obligations owed to Mr. Ghramm to repay the over-limit portion of his in-kind contribution.

11. The Campaign failed to report orders placed on a 21-day pre-general election C-4 report due October 14, 2014 totaling \$22,113, that were reported 111 days late on the combined C-4 filed February 2, 2015 that covered the period October 14, 2014 through December 10, 2014. There were invoices for Red Maverick Media through John Hanley that included \$19,386 for three direct mail pieces that was required to be reported as orders placed on the 21-day pre-general election C-4 report, due October 14, 2014. There were four expenditures to the Statesman Examiner for newspaper ads totaling \$1,552 that were required to be reported as orders placed on October 14, 2014. Finally, there was an expenditure to Silverado Express for \$1,175 for a newspaper ad that was required to be reported as an order placed on October 14, 2014.
12. The Campaign filed its C-3 and C-4 reports manually, on paper, rather than by the required electronic method. The campaign was required to file electronically because it raised and spent over \$5,000. The Campaign did not request an exemption from the electronic filing requirement, and therefore failed to report electronically.

#### IV. LAW

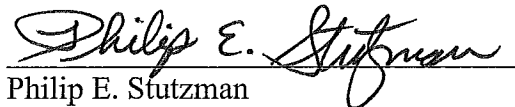
**RCW 42.17A.205** requires candidates to file a Candidate Registration within two weeks of: filing for office or making a public announcement; after the date the campaign first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.

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

**RCW 42.17A.405** states that candidates for judicial offices are subject to state contributions limits, which for the 2014 election cycle was \$1,800 per election for contributions received from an individual, corporation, union, political committee or other entity. Contributions made for the 2014 primary election were required to have been received by August 5, 2014, the date of the primary election.

**RCW 42.17A.245** states, “(1) Each candidate or political committee that expended five thousand dollars or more in the preceding year or expects to expend five thousand dollars or more in the current year shall file all contribution reports and expenditure reports required by this chapter by the electronic alternative provided by the commission under RCW 42.17A.055. The commission may make exceptions on a case-by-case basis for candidates whose authorized committees lack the technological ability to file reports using the electronic alternative provided by the commission. (2) Failure by a candidate or political committee to comply with this section is a violation of this chapter.”

RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of June, 2015.



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

PDC Case No. 15-045

Gina Tveit

Respondent.

Report of Investigation

**I.**

**Background**

- 1.1 On March 18, 2010, Gina Tveit filed a Personal Financial Affairs Statement (F-1 report) disclosing she had recently been appointed to the position of Stevens County District Court Judge.
- 1.2 On March 18, 2010, Ms. Tveit also filed a Candidate Registration (C-1 report) registering her candidacy for Stevens County District Court Judge in 2010. Ms. Tveit initially selected the Mini Reporting Option, but on May 7, 2010, amended her registration to the Full Reporting Option.
- 1.3 Ms. Tveit was elected Stevens County District Court Judge in the November 2, 2010 general election.
- 1.4 On February 11, 2014, Michael Clay filed a C-1 report registering his candidacy for Stevens County District Court Judge in 2014. Mr. Clay was a first-time candidate for public office, and selected the Full Reporting option.
- 1.5 On May 8, 2014, Mr. Clay filed a complaint with the Public Disclosure Commission (PDC) alleging that Ms. Tveit may have violated RCW 42.17A.205, .235, and .240 by failing to timely register and report as a candidate for Stevens County District Court Judge in 2014. (**Exhibit 1**)
- 1.6 On May 24, 2014, Ms. Tveit filed a C-1 report registering her candidacy for Stevens County District Court Judge in 2014. She selected the Full Reporting Option, which requires candidates to file frequent reports of contributions and expenditures. (**Exhibit 2**)
- 1.7 Ms. Tveit was elected Stevens County District Court Judge in the November 4, 2014 general election.

**II.**  
**Allegations & Summary of Investigative Findings**

- 2.1 The Complaint alleged that Ms. Tveit failed to timely register as a candidate in February 2014, after Ms. Tveit became aware that Mr. Clay was seriously considering challenging her in the November 2014 general election, and then expended funds for a private investigator to investigate Mr. Clay. Although not alleged directly by the complainant, the Complainant implied that by not registering, Ms. Tveit also failed to report the cost of hiring the private investigator.
- 2.2 PDC staff investigated the timeliness of Ms. Tveit's registration as a 2014 candidate for Stevens County District Court Judge, as well as the timeliness of reporting the initial in-kind contribution received by Ms. Tveit's campaign (Campaign), which was the cost of hiring a private investigator, paid for by Ms. Tveit's father, Gary Ghramm. In addition, staff investigated whether Ms. Tveit accepted an over-limit in-kind contribution from her father for this expenditure. (RCW 42.17A.205, .235, .240 and .405.)
- 2.3 PDC staff also investigated the timeliness of other contributions and expenditures reported by the Campaign, and whether the Campaign filed its reports using the electronic method, as required. (RCW 42.17A.235, .240, and .245)
- 2.4 PDC staff opened a formal investigation on January 15, 2015. A summary of staff's findings is noted below.
- 2.5 Mr. Ghramm engaged the services of Ted Pulver, a private investigator, to investigate Mr. Clay, sometime in January 2014. Ms. Tveit acknowledged that her father would not have engaged Mr. Pulver's services, except for the fact that Mr. Clay was a potential candidate for Stevens County District Court Judge. Shortly after Mr. Ghramm engaged the services of Mr. Pulver, Mr. Clay filed his candidate registration.
- 2.6 Ms. Tveit was aware of her father's activities, and was therefore required to file a C-1, registering her candidacy, within two weeks of the date she was informed of his activities, or by no later than February 13, 2014. She filed a candidate registration 100 days late on May 24, 2014.
- 2.7 The value of Mr. Ghramm's in-kind contribution was \$4,500. Because the contribution limit to Ms. Tveit's campaign was \$1,900 per election, Ms. Tveit accepted an over-limit in-kind contribution in the amount of \$2,600.
- 2.8 The Campaign received monetary and in-kind contributions totaling \$46,679, with an equal amount of expenditures. Of this amount, Ms. Tveit contributed \$40,207 in personal funds which represented 86.5 percent of all contributions received.
- 2.9 The Campaign failed to timely file a C-3 report disclosing the receipt of \$24,791 in personal funds from Ms. Tveit on October 1, 2014. The Campaign was required to file a C-3 report disclosing receipt of this contribution by October 6, 2014, but did not report receipt of the contribution until February 2, 2015, 119 days late and nearly three months



after the 2014 general election. The late-reported contribution represented 53.1 percent of all contributions received by the Campaign.

2.10 The Campaign failed to file its 7-day Pre-General election C-4 report, which was due by October 28, 2014, and its Post-General election C-4 report, which was due by December 10, 2014, until February 2, 2015. The report covered the period October 14 through December 10, 2014, and disclosed previously unreported activities undertaken by the Campaign prior to the election. The 7-day C-4 report was filed 97 days late, and the Post-General election C-4 report was filed 54 days late. The late reported activities included:

- 1) \$24,791 monetary contribution from Ms. Tveit's personal funds;
- 2) \$24,791 in campaign expenditures for political advertising that included direct mail pieces, newspaper advertisements, and an ad/telephone poll. These expenditures were reported 97 days late;
- 3) \$4,500 in-kind contribution received from Mr. Ghramm, Ms. Tveit's father, for the cost of hiring a private investigator to investigate Mr. Clay. This contribution was reported at least 265 days late; and
- 4) \$2,600 in outstanding debts or obligations owed to Mr. Ghramm to repay the over-limit portion of his in-kind contribution.

2.11 The Campaign filed its C-3 and C-4 reports manually, on paper, rather than by the required electronic method. The Campaign did not request an exemption from the electronic filing requirement, and therefore failed to report electronically.

### **III.** **Findings**

3.1 Candidates registered under the Full Reporting option for the 2014 election were required to file weekly C-3 reports beginning June 1, 2014, and C-4 reports on the following intervals:

- Monthly C-4 reports by the 10<sup>th</sup> of each month disclosing contribution and expenditure activities incurred in the previous calendar month, if more than \$200, provided no special reports were due during that month;
- A 21-day pre-primary election C-4 report due on July 15, 2014, covering the period June 1 through July 14, 2014;
- A 7-day pre-primary election C-4 report due on July 29, 2014, covering the period July 15 through July 28, 2014; and
- A post-primary election C-4 report by September 10, 2014, covering the period July 29 through August 31, 2014.

- A 21-day pre-general election C-4 report due on October 14, 2014, covering the period September 1 through October 13, 2014;
- A 7-day pre-general election C-4 report due on October 28, 2014, covering the period October 14 through October 27, 2014; and
- A post-general election C-4 report due on December 10, 2014, covering the period October 28 through November 30, 2014.

3.2 Staff reviewed the C-3 and C-4 reports filed by Gina A. Tveit during the 2014 election cycle. Ms. Tveit submitted the following emailed responses and documents to PDC staff concerning Mr. Clay's allegations and staff's questions, which were also reviewed:

- May 29, 2014, email transmitted by Ms. Tveit to PDC staff concerning her declaration of candidacy, the filing of her C-1 report, and Mr. Clay's allegations that she: (1) obtained public court records of Mr. Clay from the Court Clerk that included his three divorces and two other files, without having to pay for them and thus receiving preferential treatment; and (2) failed to timely register and report as a candidate for the 2014 election, when she received an in-kind contribution for investigative services of Mr. Clay that were paid for by Ms. Tveit's father. **(Exhibit #3)**
- March 17, 2015, email transmitted by Ms. Tveit to PDC staff responding to staff's February 23, 2015, email requesting additional information from her in PDC Case No. 15-045. **(Exhibit #4)**
- March 18, 2015, email transmitted by Ms. Tveit to PDC staff in which she attaches a copy of the "sample survey script" and three invoices from Red Maverick Media for the direct mail pieces. **(Exhibit #5)**

3.3 Ms. Tveit stated that she was elected Stevens County Municipal Court Judge in 2010, and that she spent approximately \$10,000 on her campaign. She stated that her 2010 campaign did not meet the required thresholds to file PDC reports electronically using the Online Reporting of Campaign Activity (ORCA). She stated that it was her intention to file her PDC reports electronically for the 2014 election, but she had no understanding of what was required to file her reports electronically for the 2014 campaign.

3.4 Ms. Tveit stated that when she downloaded the ORCA software, she experienced a number of problems since her personal computer ran on an outdated operating system. She stated that to date, she has been unable to transmit any of her PDC reports electronically.

3.5 The Campaign filed its initial C-4 report on June 11, 2014, listing no beginning date for the C-4 report, that the report disclosed activities through June 10, 2014, and included a \$5,000 monetary contribution had been received from Ms. Tveit, and one expenditure totaling \$4,862 had been made to Stick-It Signs on May 22, 2014. The C-4 report was filed one day late.

- 3.6 The Campaign filed a combined June and July C-4 report on August 11, 2014, covering the reporting period of June 10 through August 10, 2014. The C-4 report disclosed that \$1,322 in monetary contributions was received by the campaign (+ \$6,000 on line 8), although no deposit information was listed, so it was not possible to ascertain when the monetary contributions had been received and deposited. The C-4 report disclosed the campaign made a number of expenditures totaling \$7,210 during the months of June and July, 2014.
- 3.7 The June 2014 portion of the activities reported on the C-4 report disclosed the Campaign made eight expenditures during the month of June totaling \$6,551. The June 2014 Campaign expenditures included; (1) Three expenditures to Stick-It Signs totaling \$4,767; (2) An \$872 expenditure to Campaign Pros for political advertisements in form of pens and notebooks; and (3) A \$543 expenditures to Colville Printing for campaign brochures. A June C-4 report was required to have been filed by the Campaign by July 10, 2014, and the June portion of campaign activities were disclosed 32 days late.
- 3.8 The Campaign filed an August on September 15, 2014, covering the reporting period August 10 through September 10, 2014, and disclosing \$3,300 in monetary contributions received, and that the campaign made six expenditures totaling \$2,607. An August C-4 report was required to have been filed by September 10, 2014. The August C-4 report was filed five days late.
- 3.9 The Campaign timely filed the 21-day Pre-General Election C-4 report on October 14, 2014, covering the reporting period of September 10 through October 13, 2014. The C-4 report disclosed the campaign received \$2,016 in new monetary contributions, and made \$2,709 in expenditures during the reporting period.

**Allegation No. 1: Failure to file C-3 and C-4 reports (RCW 42.17A.235 and .240)**

- 3.10 After timely filing the 21-day Pre-General election C-4 report on October 14, 2014, the Campaign stopped filing reports until after the November 5, 2014 general election, and after PDC staff had logged in the complaint filed by Mr. Clay. On February 2, 2015, Ms. Tveit filed a C-3 and C-4 report manually on paper as detailed below. **Exhibit #6.**

**C-3 report:**

- 3.11 The C-3 report disclosed Ms. Tveit contributed \$24,791 using her personal funds on October 1, 2014, and that those funds were deposited into the campaign bank account on October 1, 2014. Ms. Tveit was required to have filed a C-3 report not later than October 6, 2014 disclosing the contribution.
- 3.12 The C-3 report was filed 119 days late by Ms. Tveit and almost three months after the 2014 general election had been held. The \$24,791 monetary contribution made by Ms. Tveit in personal funds represented 53.1% of the total monetary and in-kind contributions received by the campaign for the entire 2014 election cycle.

**C-4 report:**

- 3.13 The Campaign failed to timely file a 7-day Pre-General election and Post-General election C-4 report.
- 3.14 On February 2, 2015, the Campaign filed one combined C-4 covering the period October 14 through December 10, 2014, and disclosing previously unreported activities that included: (1) the \$24,791 monetary contribution from Ms. Tveit; (2) \$24,791 in campaign expenditures for political advertisements; (3) a \$4,500 over-limit in-kind contribution from Ms. Tveit's father; and (4) a \$2,600 outstanding debt or obligation for the over-limit portion of the in-kind contribution.
- 3.15 The combined C-4 report disclosed a November 1, 2014, expenditure made by the Campaign to John Hanley totaling \$20,636 for the printing and postage of three direct mail pieces, and for the costs of an automated telephone poll, all reported after the November 4, 2014 general election. Staff requested and reviewed the invoices for the three direct mail pieces which listed Red Maverick Media was the vendor that printed and mailed the three direct mail pieces, for a total cost of \$19,386.
- 3.16 All three invoices from Red Maverick Media listed an orders-placed date of October 8, 2014, which required the Campaign to disclose the direct mail pieces as an outstanding obligation on the 21-day Pre-General election C-4 report. The 21-day Pre-General election C-4 report was due to be filed by the Campaign on October 14, 2014, and the \$19,386 portion of the \$20,636 expenditure made to Jon Hurley, was disclosed 111 days late.
- 3.17 The combined C-4 report also disclosed:
- The Campaign made expenditures to the Statesman Examiner totaling \$1,552 for four newspaper advertisements in October (run dates: 10/3; 10/9; 10/16; and 10/22), and one \$1,175 expenditure to Silverado Express on October 10, 2014, for a newspaper advertisement. The five expenditures was disclosed 111 days late.
  - A \$4,500 in-kind contribution was received by the Campaign from Gary Ghramm, Ms. Tveit's father, with the description listed as "Services." The in-kind contribution was reported as having been received by the Campaign on May 12, 2014. (NOTE - In section 3.22 of this Report of Investigation, Ms. Tveit acknowledged that Mr. Ghramm retained the services of a private investigator in January of 2014).
  - Based on that statement, an initial in-kind contribution should have been reported on a February 2014 C-4 report due by March 10, 2014. The in-kind contribution from Mr. Ghramm was disclosed 328 days late.
- 3.18 Ms. Tveit stated that she filed her C-3 and C-4 reports manually on paper, which she postmarked on February 2, 2015. Ms. Tveit stated that the failure to timely file the PDC reports was not intentional, and that the errors she encountered while attempting to file using the ORCA software contributed to the late reporting of the manual reports. She went on to state:

- That almost "...all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed."
- "The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed."
- She confirmed she deposited \$24,790.75 in personal funds into the campaign bank account on October 1, 2014, and that the amount deposited was based on campaign expenses she knew she was going to be incurring. She acknowledged that she failed to timely disclose the personal funds contributed by her on the C-3 report, and the corresponding expenditures she made using those funds on a C4 report.
- The expenditures made to Mr. Hanley by her Campaign were for three political advertisements in the form of direct mail postcards and a "telephone ID" automated poll. She stated that Stevens County is a vote-by-mail county, so she began mailing the postcards on the day the general election ballots were mailed out to registered voters by the Stevens County Auditor's Office.
- The telephone poll cost \$1,250 and was conducted with the purpose of measuring candidate name recognition, and favorable vs. unfavorable opinions of Ms. Tveit and Mr. Clay. She stated the short five questions telephone poll was conducted of "...most likely Stevens County voters with landlines."

**Allegation No. 2: Receiving an in-kind contribution that exceeded the \$1,800 per election contribution limits (RCW 42.17A.405)**

- 3.19 On May 8, 2014, PDC staff member Tony Perkins sent an email to Ms. Tveit informing her that PDC staff was in receipt of an inquiry alleging that her 2014 campaign for re-election had made campaign expenditures in support of her candidacy, but she had failed to file a C-1 report.
- 3.20 On May 10, 2014, Ms. Tveit responds to Mr. Perkins email stating she has not made any campaign expenditures in support of her 2014 campaign, but that once she filed her declaration of candidacy, she intended to comply with the PDC requirements and file her campaign reports.
- 3.21 On May 29, 2014, PDC staff receives Ms. Tveit's initial response to the complaint filed by Mr. Clay and responding to the allegation that she hired a private investigator to investigate him. **See Exhibit #3.** Ms. Tveit stated the following concerning the private investigator issue:

*"Sometime in the winter or 2013, my father and I discussed the rumor that Mike Clay was considering running for District Court Judge. For years there has been widespread gossip in the community regarding Mike Clay's inappropriate relationships with women involved in the court cases he was handling, either as a deputy prosecutor or a contracted public defender, perhaps even criminal conduct..."*

3.22 Ms. Tveit stated that her father had expressed to her his concerns regarding the Michael Clay allegations. She stated that he decided on his own to contact Ted Pulver, a private investigator in Idaho, in an attempt to confirm or deny the information about Mr. Clay that they had been hearing. She stated Mr. Pulver completed a report in April of 2014, and his "...*investigation revealed very serious allegations of professional misconduct...*"

3.23 Ms. Tveit stated she forwarded Mr. Pulver's report to the Washington State Bar Association, and went on to state that she had:

*"...no intentions of using the information contained in the report during my campaign. I can truly say that I had never considered this a campaign expenditure, which commonly would include expenses for such items as campaign signs, advertising, brochures, etc..."*

3.24 On June 12, 2014, Mr. Perkins sent an email to Ms. Tveit acknowledging her May 29, 2014 response email, and asking her to respond to staff's additional questions concerning the in-kind contribution from her father, Mr. Ghramm. Staff's questions included: (1) Did Ms. Tveit understand that Mr. Clay was considering running for Stevens County District Court Judge? (2) Who sponsored the investigative services of Ted Pulver, and when were those services engaged by her father? (3) Would her father have engaged Mr. Pulver's services if Mr. Clay had not been a candidate? and (4) Has her father incurred the costs for investigative services on her behalf in other instances?

3.25 On June 20, 2014: Ms. Tveit responded to Mr. Perkins' five questions and stated that she did assume Mr. Clay was going to be running for Stevens County District Court Judge in 2014 when she was having discussions with her father, Gary Ghramm. She stated that Mr. Ghramm "...*sponsored Mr. Pulver's investigation and it was his decision to do so...*"

3.26 Ms. Tveit stated that she believed her father engaged Mr. Pulver's services sometime in January of 2014. She stated that she believed her father would not have engaged Mr. Pulver's services, but for the fact that Mr. Clay was a potential opponent in Judge Tveit's campaign for Stevens County District Court Judge. She stated that she was not aware of any other instances in which her father had engaged investigative services of that nature.

3.27 Ms. Tveit went on to state

*"It is important that the information developed from the investigation has not been used by my campaign. The investigation report was immediately turned over to the Washington State Bar Association according to my obligation under the Judicial Rules of Conduct."* At the end of the email, Judge Tveit stated, *"If I were to publically disclose the expense at this time, what would happen next?"*

3.28 Mr. Perkins replied to Ms. Tveit's email, and advised her to report the costs for the investigator either as an in-kind contribution from her father or as a reimbursement from the campaign to her father for the amount of the over-limit portion of the contribution. On July 31, 2014, Mr. Perkins followed-up with an additional email stating that the investigative costs had not yet been reported by the Tveit campaign. He asked Ms. Tveit whether she intended to report the costs on the PDC reports.

- 3.29 On August 4, 2014, Ms. Tveit replied that she intended to proceed as advised by Mr. Perkins, but she wants to talk with PDC staff in more detail concerning the complaint. On August 12, 2014, Ms. Tveit informs staff by email that she has mailed her C-3 and C-4 reports, but she still wanted to talk about the complaint.
- 3.30 On August 13, 2014, PDC received the C-4 report from the Tveit campaign, however the report failed to disclose the costs of the investigator, either as an in-kind contribution from Mr. Ghramm, or as a monetary expenditure from the campaign reimbursing Mr. Ghramm for the over-limit portion of the contribution.
- 3.31 On February 2, 2015, the Campaign filed a C-4 report disclosing the May 12, 2014 receipt of \$4,500 in-kind contribution from Mr. Ghramm, which exceeded the 2014 primary contribution limits of \$1,800 by \$2,600. The C-4 report also disclosed that the Campaign owed a \$2,600 outstanding debt or obligation to Mr. Ghramm for the over-limit portion of the contribution. This was the first-time the campaign disclosed the in-kind contribution from Mr. Ghramm, more than a year after Mr. Ghramm retained the investigative services of Mr. Pulver.

**Allegation No. 3: Failure to timely file a Candidate Registration (RCW 42.17A.205)**

- 3.32 RCW 42.17A.205 requires candidates to file a C-1 report within two weeks after the date the campaign first: (1) Solicits contributions or has the expectation of receiving contributions; (2) Reserves space, orders campaign goods or services, or makes expenditures in any election campaign; or (3) Files a Declaration of Candidacy or makes a public announcement, whichever is earlier.
- 3.33 Ms. Tveit stated that she assumed Mr. Clay was going to be running for Stevens County District Court Judge in 2014, and that her father engaged Mr. Pulver's services sometime in January of 2014.
- 3.34 On February 11, 2014, Michael Clay filed a C-1 report registering his candidacy.
- 3.35 Ms. Tveit stated that she doubted her father would have engaged Mr. Pulver's services if Mr. Clay had not been a potential candidate for Stevens County District Court Judge. Based on statements she made that Mr. Ghramm first paid for Mr. Pulver's investigative services of Michael Clay on her behalf sometime in January of 2014, she was required to file a C-1 report within two weeks or not later than February 13, 2014. The C-1 report was filed 100 days late.

**Gina Tveit Responses:**

- 3.36 In 2014, Ms. Tveit stated that her opponent, Mr. Clay "*...ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negativity, which included negative weekly newspaper advertising and negative direct mailings....*"

- 3.37 Ms. Tveit stated that for those reasons, she consulted with Mr. Hanley who contracted with Red Maverick Media to produce the three political advertisements and the telephone poll. She stated the telephone poll “...was designed to measure name recognition and to try to determine what effect my opponent’s constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out....;”
- 3.38 Ms. Tveit stated her name did not appear on the 2014 primary election ballot, and that she intended to file her PDC reports disclosing her campaign expenses, but that she was delayed due to her difficulties in filing the reports electronically. She stated that her campaign remained positive throughout, despite the fact she:
- “...had very damaging information on my opponent from the results of the private investigator’s report, I never used this information in my campaign. Even though I was well aware of my opponent’s reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a copy of the report, I immediately forwarded it the WSBA....”*
- 3.39 Ms. Tveit stated that she has not received any updates concerning the status of the Washington State Bar Associations investigation into Mr. Clay.

#### IV. Scope

- 4.1 PDC staff reviewed the following:
- The complaints filed against Gina Tveit by Michael Clay;
  - Campaign finance reports, including C-1, C-3 report and C-4 reports, filed by Gina Tveit for the 2014 election, and for the 2010 election;
  - Results of PDC database query;
  - Email exchanges between Ms. Tveit and PDC staff member Tony Perkins;
  - Response from Ms. Tveit.

#### V. Law

- 5.1 **RCW 42.17A.205** requires candidates to file a Candidate Registration within two weeks of: filing for office or making a public announcement; after the date the campaign first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.
- 5.2 **RCW 42.17A.235 and .240** require political candidates to file timely, accurate reports of contributions and expenditures, including in-kind contributions. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Contributions are reported weekly during this same



time period, and must be disclosed on Monday for contributions deposited the previous seven days.

- 5.3 **RCW 42.17A.405** states that candidates for judicial offices are subject to state contributions limits, which for the 2014 election cycle was \$1,800 per election for contributions received from an individual, corporation, union, political committee or other entity. Contributions made for the 2014 primary election were required to have been received by August 5, 2014, the date of the primary election.
- 5.4 **RCW 42.17A.245** states, “(1) Each candidate or political committee that expended five thousand dollars or more in the preceding year or expects to expend five thousand dollars or more in the current year shall file all contribution reports and expenditure reports required by this chapter by the electronic alternative provided by the commission under RCW 42.17A.055. The commission may make exceptions on a case-by-case basis for candidates whose authorized committees lack the technological ability to file reports using the electronic alternative provided by the commission. (2) Failure by a candidate or political committee to comply with this section is a violation of this chapter.”

Respectfully submitted this 12<sup>th</sup> day of June, 2015.

  
Kurt Young  
PDC Compliance Officer


#### List of Exhibits

- Exhibit #1** May 8, 2014, complaint filed by Michael Clay with the Public Disclosure Commission against Gina Tveit.
- Exhibit #2** Candidate Registration filed by Gina Tveit on May 24, 2014, declaring her candidacy for re-election as Stevens County District Court Judge in 2014.
- Exhibit #3** May 29, 2014, email transmitted by Ms. Tveit to PDC staff concerning her declaration of candidacy, the filing of her C-1 report, and additional allegations in the complaint.
- Exhibit #4** March 17, 2015, email transmitted by Ms. Tveit to PDC staff in response to staff's February 23, 2015, email and letter requesting additional information in PDC Case No. 15-045
- Exhibit #5** March 18, 2015, email transmitted by Ms. Tveit to PDC staff attaching a copy of the “sample survey script” and three invoices from Red Maverick Media for three direct mail pieces.
- Exhibit #6** February 2, 2015, C-3 and C-4 report filed manually on paper by Ms. Tveit disclosing contribution and expenditure activities undertaken prior to the election.

RECEIVED

MAY - 8 2014

Office Use Only: No. \_\_\_\_\_

Public Disclosure Commission
 <b>WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION</b> <b>COMPLAINT FORM</b> <i>(See instructions on the last page.)</i>
<b>Description of Complaint</b>

**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*

Judge Gina Tveit

Stevens County District Court

215 South Oak Room 213

Colville, Washington 99114 509-684-5249

**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.)

**I gave notice no later than February 13, 2014 to the Public Disclosure Commission that I am a candidate for Stevens County District Court Judge.**

RCW 42.17A005(7) indicates that a candidate is any individual who seeks nomination to public office. A person becomes a candidate when the person makes expenditures to promote his or her campaign. Once this happens RCW 42.17A.235 as well as other chapter statues create reporting requirements.

My allegation is that Judge Gina Tveit hired a private investigator no later than February 10, 2014 to investigate myself once she became aware that I was seriously considering challenging her in the November 2014 general election. This was done in an attempt to dig up dirt on myself and or attempt to scare me into not running against her. As of May 8<sup>th</sup> Judge Tveit has filed nothing with the Washington State Public Disclose Commission. It is my opinion that Judge Tveit's failure to comply with Washington Election law is not deminimus but in fact is a material breach of her duty to follow the laws of this state.

RECEIVED

**Evidence and Witnesses**

MAY -8 2014

Public Disclosure Commission

**3. EVIDENCE:**

In early J

**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.**

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

In early January 2014 I was advised by a member of the Stevens County Superior Court that Judge Gina Tveit had gone to the Superior Court Clerk's Office to obtain copies of my 2 divorce files in Stevens County. I later confirmed this with the elected clerk Patricia Chester. I was also informed by Ms. Chester that there was no record of Judge Tveit paying the normal costs associated with this request. Failure to pay the costs associated with producing those records appears to be a violation of the Code of Judicial Conduct. CJC Rule 4.1 (A) (9). While a Public Disclosure Complaint is not the proper venue to investigate a violation of the Code of Judicial Conduct the information is offered as evidence of Judge Tveit's intent.

In early February I began receiving phone calls from woman I had previously dated including an ex-wife who indicated they were contacted by a private investigator. The investigator gave his name as Ted Pulver. Mr. Pulver gave vague answers when asked who he was working for. On May 6, 2014 I met with Kip Hill who is an investigative reporter with the Spokane newspaper. Mr. Hill told me he was contacted by Mr. Pulver regarding some woman I had previously dated. I was informed by the investigative reporter that Mr. Pulver indicated that he was hired by Judge Gina Tveit.

There is only one possible explanation for Judge Tveit conduct. Clearly Judge Tveit was intending to further her campaign to be reelected Stevens County District Court Judge. Hiring Mr. Pulver in an attempt to run a smear campaign against me is a clear campaign expenditure. Judge Tveit had a duty under Washington law to report the expenditure.

**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.**

*Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.*

Please see above;

Ted Pulver can be reached on 208-773-3211

RECEIVED

MAY - 8 2014

Kip Hill can be reached on 509-459-5420

Public Disclosure Commission

Patricia Chester can be reached on 509-684-7575

**Certification**

**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) **Michael E. Clay**

Street address **107 North Main Suite 2**

City, state and zip code **Colville, Washington 99114**

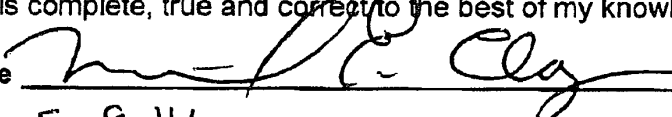
Telephone number (including area code) **509-684-8780**

E-mail address (optional) **Lawofficesofmikeclay@yahoo.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 

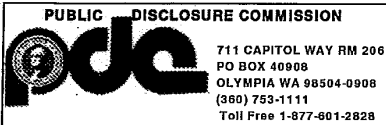
Date signed 5-8-14

Place signed (city and county)  
**Colville, Washington**

**Stevens**

City

County



# Candidate Registration

**C1**  
(1/2008)

100580808

05-24-2014

Candidate's Name (Give candidate's full name.)

GINA A TVEIT

Telephone Number

509-680-1206

Candidate's Committee Name (Do not abbreviate.)

COMMITTEE TO ELECT JUDGE GINA TVEIT

Fax Number

Mailing Address

669 PEND OREILLE LOOP

Candidate's E-Mail Address

JUDGEGINATVEIT@GMAIL.COM

City

County

Zip + 4

COLVILLE

STEVENS

99114

Campaign E-Mail Address

judgeginatveit@gmail.com

1. What office are you running for?

Legislative District, County or City

Position No.

Do you now hold this office?

DISTRICT COURT JUDGE

STEVENS CO DISTRICT COURT

NA

Yes

No

2. Political party (if partisan office)

NON PARTISAN

3. Date of general or special election

11-04-2014

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 X. See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet.  Continued on attached sheet.

GINA A TVEIT

669 PEND OREILLE LOOP, COLVILLE WA 99114

Daytime Telephone Number

509-680-1206

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.

PHIL STALP, CAMPAIGN MANAGER, 685 S. MINER, COLVILLE WA 99114

8. Campaign Bank or Depository

Branch

City

KEY BANK

COLVILLE

COLVILLE

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

669 PEND OREILLE LOOP, COLVILLE

In order to make an appointment, contact the campaign at (telephone, fax, e-mail): 509-680-1206 JUDGEGINATVEIT@GMAIL.COM

11. **CERTIFICATION:**

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

Candidate's Signature

GINA A TVEIT

Date

05-24-2014

## Jon Ammons

---

**From:** gina tveit <ginatveit@hotmail.com>  
**Sent:** Thursday, May 29, 2014 10:13 PM  
**To:** PDC  
**Attachments:** IMG\_0001.jpg; IMG\_0002.jpg; IMG\_0003.jpg; IMG\_0004.jpg; IMG\_0005.jpg; IMG\_0006.jpg; IMG\_0007.jpg; IMG\_0008.jpg; IMG\_0009.jpg

May 29, 2014  
Public Disclosure Commission  
711 Capitol Way Room 206  
P.O. Box 40908  
Olympia, WA 998504-0908  
Re: T14-104

Dear Mr. Stutzman,

Please be advised that I filed a Declaration of Candidacy with the Stevens County Auditor for the position of District Court Judge on May 12, 2014. I subsequently submitted my Candidate Registration for filing with the PDC on May 21, 2014.

I will first respond to the allegation that I obtained public records from Superior Court files without paying for them. In the afternoon of Friday December 6, 2013, I went to the Superior Court Clerk's office. I stood in line at the public window. There was someone in front of me being assisted and I waited my turn. I then handed the deputy clerk, Jenna Bourgeau, a piece of paper containing 5 case numbers and said I wished to check out these files and take them home for the weekend. For the past 25 years that I have worked in the legal field, this is common practice and procedure for members of the legal community. The clerk stated that she could just "email" the files rather than pulling them and physically giving them to me. I told her that I was not familiar with that process and I wasn't even sure which documents I would want to look at from each file. She stated that she would simply email the entire file. I made it very clear that this was a personal request and not work related. If she wanted to email the files to me she would have to send them to my personal email account and not my county email account. I wrote my personal email account down on the same piece of paper that I had given to her with the case file numbers. I further told the clerk that I would not be able to retrieve the email until after I got home. AT NO TIME DID THE DEPUTY CLERK INFORM ME THAT THERE WAS A FEE DUE FOR MY REQUEST. In fact, if she had simply pulled the files as I had requested, there would be no fee incurred. AT NO TIME UP TO AND INCLUDING THE PRESENT DATE AND TIME, HAS ANYONE FROM THE CLERK'S OFFICE REQUESTED THAT I PAY A FEE. After receiving this complaint, I did contact the elected Superior Court Clerk, Patricia Chester. She indicated that she did receive a phone call from Mike Clay asking whether or not I had checked out files and paid a fee. After checking with her staff, she confirmed to Clay that I had checked out files and had not paid a fee. Ms. Chester indicated to me that she did not think I had done anything improper and she would write a statement to that effect. I also stated to her that if a fee was owed I certainly would pay it. Ms. Chester told me that she would get back to me with her statement and let me know what amount, if any, was owed. As to whether or not someone from the clerk's office advised Clay that I had obtained these files, Ms. Chester was unaware of that. There wouldn't seem to be any legitimate reason for that to occur. The files that I requested were the files that are listed on the *Inside Courts* public website under Clay's name. The files are three of his divorce files and two criminal files. I am attaching copies of the email(s) I received from the deputy clerk with the attached files sent to my personal Hotmail account.

Secondly, I will respond to the allegation regarding the private investigator. Sometime in the winter of 2013, my father and I discussed the rumor that Mike Clay was considering running for District Court Judge. For years there has been widespread gossip in the community regarding Mike Clay's inappropriate relationships with women involved in the court cases he was handling, either as a deputy prosecutor or a contracted public

defender. My father expressed to me great concern regarding these allegations and he contacted Ted Pulver for the purpose of either confirming or denying these rumors. The fact is, Mr. Pulver's investigation revealed very serious allegations of professional misconduct, perhaps even criminal conduct. When the report was completed in April 2014, I felt that I had an obligation under the Judicial Code of Conduct to forward the report to the Bar Association, which I did do. As far as I'm concerned, the report is in the appropriate hands and that is where the matter needs to remain. I have no intentions of using the information contained in the report during my campaign. I can truly say that I had never considered this a campaign expenditure, which commonly would include expenses for such items as campaign signs, advertising, brochures, etc.

I am also attaching copies of three (3) letters received from Mike Clay indicating that as of April 2013 he had moved to Western Washington. I have never received any information indicating that he had actually returned to Stevens County and I honestly don't even know when that occurred.

In conclusion, I have always had every intention of being in compliance with the PDC requirements. I would like the opportunity to do some additional research and to talk with PDC staff with my questions. I am asking for one additional week.

Thank you for your consideration.

Sincerely,

Gina A. Tveit

[Print](#)

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**Case # 00-3-01437-4**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)  
Sent: Fri 12/06/13 10:34 PM  
To: ginatveit@hotmail.com (ginatveit@hotmail.com)

I tried looking this case up in SCOMIS but I couldn't find anything... This might be in a different county.

Have a great weekend ☺

*Jenna Bourgeau*

*Deputy Clerk*

*Superior Court*

*215 S. Oak Room 206*

*Colville, WA 99114*

*(509) 684-3481*



[Print](#)

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**Case # 09-3-00079-6**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:28 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

6 attachments

CC000001.TIF (96.1 KB) , CC000002.TIF (129.5 KB) , CC000003.TIF (355.5 KB) ,  
CC000004.TIF (250.0 KB) , CC000005.TIF (183.5 KB) , CC000006.TIF (107.5 KB)

[Print](#)

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## Case # 12-1-00086-1

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:28 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

38 attachments

CC000001.TIF (139.6 KB) , CC000002.TIF (307.6 KB) , CC000003.TIF (254.2 KB) ,  
CC000004.TIF (47.1 KB) , CC000005.TIF (53.1 KB) , CC000006.TIF (77.5 KB) ,  
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CC000010.TIF (104.4 KB) , CC000011.TIF (69.7 KB) , CC000012.TIF (49.6 KB) ,  
CC000013.TIF (197.3 KB) , CC000014.TIF (83.8 KB) , CC000015.TIF (68.2 KB) ,  
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CC000019.TIF (329.6 KB) , CC000020.TIF (78.6 KB) , CC000021.TIF (234.4 KB) ,  
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CC000028.TIF (50.2 KB) , CC000029.TIF (90.2 KB) , CC000030.TIF (45.2 KB) ,  
CC000031.TIF (66.8 KB) , CC000032.TIF (64.8 KB) , CC000033.TIF (271.4 KB) ,  
CC000034.TIF (683.4 KB) , CC000035.TIF (755.8 KB) , CC000036.TIF (55.2 KB) ,  
CC000037.TIF (88.7 KB) , CC000038.TIF (95.1 KB)

[Print](#)

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## Case # 12-1-00158-2

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:26 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

44 attachments

CC000001.TIF (153.7 KB), CC000002.TIF (328.0 KB), CC000003.TIF (232.4 KB),  
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CC000013.TIF (339.5 KB), CC000014.TIF (51.6 KB), CC000015.TIF (88.0 KB),  
CC000016.TIF (71.7 KB), CC000017.TIF (123.2 KB), CC000018.TIF (405.4 KB),  
CC000019.TIF (51.0 KB), CC000020.TIF (40.6 KB), CC000021.TIF (48.8 KB),  
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CC000043.TIF (87.9 KB), CC000044.TIF (89.9 KB)

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**Case # 04-3-00262-3**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:30 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

7 attachments

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CC000004.TIF (35.4 KB), CC000005.TIF (53.4 KB), CC000006.TIF (436.1 KB),  
CC000007.TIF (403.9 KB)

*LAW OFFICE OF  
MICHAEL E. CLAY*

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---

Michael E. Clay, Attorney At

Stevens County Commissioners  
215 South Oak  
Colville, Washington 99114

September 28, 2012

Re: Notice of resignation

Dear Commissioners,


Due to recent family medical issues regarding my mother who suffers from Alzheimer's disease and who now resides with me I have decided to resign my position as a Court appointed attorney for District Court.

I regret having to make this decision however I feel that it is best for my family as well as my client's.

I want to express my deep gratitude for being able to serve District Court as a court appointed attorney for the last six years. I understand pursuant to paragraph 13 section "c", of my District Court contract, that this resignation will be effective at the end of December 2012 and that I am responsible for the completion of all cases assigned prior to December 31, 2012.

I do not anticipate that these family issues will have any effect on the other criminal defense contracts I have with Stevens County.

Sincerely,

  
Michael Clay  
Attorney

cc Judge Gina Tveit  
cc Prosecutor Tim Rasmussen

**LAW OFFICE OF  
MICHAEL E. CLAY**

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---



December 31, 2012

Stevens County Commissioners  
215 South Oak  
Colville, WA 99114

RE: Notice of Resignation / Withdrawal

Dear Commissioners,

I am withdrawing my resignation from the District Court Contract that was given to you on September 28, 2012.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael E. Clay".

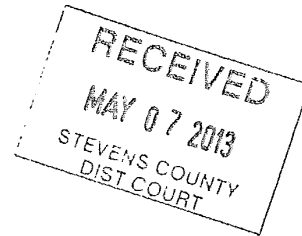
Michael E. Clay  
Attorney At Law

cc Lloyd Nickel  
cc Gina Tveit

**LAW OFFICE OF  
MICHAEL E. CLAY**

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---



April 25, 2013

To: Stevens County Superior Court  
Stevens County Juvenile Court  
Stevens County District Court  
Chewelah Municipal Court  
Kettle Falls Municipal Court

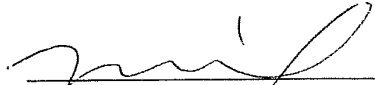
As you may be aware, I have recently married and will be relocating my residence and my legal practice to Western Washington. I currently have several indigent defense contracts within Stevens County which provide that my portion of each contract may be assigned to another competent attorney. I believe that I have located a suitable attorney to take over my place on these contracts.

Michael Golden is currently a deputy prosecuting attorney in Ferry County. He has been a lawyer since 1996 and has worked as a prosecutor since 2002. In the two years he has worked in Ferry County, I have had the opportunity to observe his demeanor, ability and work ethic, and I believe he would be an excellent choice to replace me on these contracts. Mr. Golden is committed to remaining in this area. He has purchased a home near Colville where he, his wife and their two children reside. His wife operates a business in downtown Colville, and their two children attend Colville Schools. I have met with Mr. Golden, and he is willing to take over these contracts on the dates indicated below.

With all this in mind, and pursuant to the contract assignment provisions, I hereby assign my portion of the Superior Court, District Court and initial appearance contracts to attorney Michael Golden, WSBA# 26128, effective June 1, 2013.. This also serves as assignment of my portion of the Chewelah and Kettle Falls conflicts indigent defense contract to Mr. Golden, effective June 1, 2013. I also assign my portion of the Juvenile indigent defense contract to Michael Golden at a date to be determined later if I decide to give up the Juvenile contract.

With the exception of the juvenile contract, as of the dates set forth above, Mr. Golden will be substituted in as counsel of record on all cases subject to these contracts, and all new assignments after those dates of assignment will be assigned to Mr. Golden.

I will do my best to help ensure a smooth transition of services to minimize any disruption that may be caused by this assignment. If you have any questions or concerns, please do not hesitate to contact me directly at (509) 684-8780.



Mike Clay

cc: DPA Lloyd Nichol, Michael Golden, Bob Simone, Paul Wasson, Melissa May, Jim Irwin, Dee Hokom, Josh Gilstrap, Gary Weber



## Kurt Young

---

**From:** Gina Tveit <ginatveit@hotmail.com>  
**Sent:** Tuesday, March 17, 2015 4:14 PM  
**To:** Kurt Young  
**Subject:** RE: PDC Case No. 15-045

Dear Mr. Young,

Below are my responses to the questions that were set forth in your email dated February 23, 2015:

1. My intention was to file my final PDC reports electronically. When I experienced difficulty with this due to an outdated operating system on my personal pc, I filed my final reports on paper and submitted those on February 2, 2015. It was never my intention not to file the reports.
2. Yes, all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed. The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed.
3. The figure of \$24,790.75 was based on campaign expenses incurred, reported on schedule A to C4.
4. The advertisement expenses from Mr. Hanley were for three (3) direct mail postcards sent out starting on the day the general ballots were mailed out to the voters. Stevens County is vote by mail only. I will send you a copy of the invoices.
5. The phone poll was an ID autopoll. The purpose of the poll was to measure name recognition and favorable vs. unfavorable opinion as to my opponent and myself. The poll was sent to the most likely Stevens County voters with landlines. The cost of the poll was \$1250.00. I will send a copy of the script and invoice from the poll.

It might be helpful for your to understand a little bit of the background to 2014 my campaign. I was elected in 2010 to my current position and spent approximately \$10,000 on my campaign. In 2014, my opponent, Michael Clay, ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negativity, which included negative weekly newspaper advertng and negative direct mailings. That is why I consulted with John Hanley of Red Maverick Media. The phone poll was designed to measure name recognition and to try to determine what effect my opponent's constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out. My opponent and I were not on the primary ballot. I never intended to not report my campaign expenses, but I was delayed due to the difficulty I had doing so electronically. In 2010, I was not required to file my reports electronically and I had no understanding of what that would entail.

In addition, I would like you to know that my campaign remained positive throughout. Even though I had very damaging information on my opponent from the results of the private investigator's report, I never used this information in my campaign. Even though I was well aware of my opponent's reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a coy of the report, I immediately forwarded it the WSBA. I felt I had a judicial responsibility to do so but I did not request to be involved as the complainant. As such, I do not receive updates from the bar and I do not know the status of the bar investigation. As far as I a concerned, the information is where it should be and I will let the bar association proceed however they see fit.

Please feel to contact me to discuss this matter further. Once I have provided the information you have requested, it is my intention to proceed with re-filing my reports electronically.

Sincerely,

Gina A. Tveit  
509-680-1206

---

**From:** Kurt Young [mailto:kurt.young@pdc.wa.gov]  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** ginatveit@hotmail.com  
**Subject:** PDC Case No. 15-045

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line

## **Kurt Young**

---

**From:** Kurt Young  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** 'ginatveit@hotmail.com'  
**Subject:** PDC Case No. 15-045  
**Attachments:** Gina Tveit - Request for information ltr.pdf

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

February 23, 2015

THE HONORABLE GINA TVEIT (Sent by email to: [ginatveit@hotmail.com](mailto:ginatveit@hotmail.com))  
669 PEND OREILLE LOOP  
COLVILLE WA 99114

Subject: Request for additional information; PDC Case No. 15-045

Dear Judge Tveit:

The Public Disclosure Commission (PDC) is in receipt of the Campaign Summary Contributions and Expenditures report (C-4 report) and Monetary Contributions report (C-3 report) you filed on February 2, 2015. PDC staff reviewed the C-3 and C-4 reports you submitted manually on paper, and found you filed a C-4 report on October 14, 2014 on paper covering the period September 10 through October 13, 2014, and then it appears you stopped filing until after staff logged in the complaint filed by Mr. Clay.

The C-4 report you submitted on February 2, 2015, stated that it covered the period October 14 through December 10, 2014, but disclosed information dating back to October 1, 2014, so the dates covered by the 21-day pre-general election C-4 report and the 7-day pre-general election C-4 report overlapped one another.

Staff is following-up on the information you disclosed on those C-3 and C-4 reports, the allegations listed in the complaint, and your prior correspondence with PDC staff concerning the following three issues: (1) Late-filed campaign finance reports and the information disclosed on those reports; (2) Receipt of over-limit in-kind contributions from Gary Ghramm; and (3) Details concerning the telephone poll or survey calls undertaken on behalf of your campaign. Concerning the February 2, 2015 reports:

- Please explain why you stopped filing PDC reports on paper prior to the election.
- Did you make a \$24,790.75 monetary contribution using personal funds to your campaign on October 1, 2014, and deposit those funds into the campaign bank account? Did you write any personal checks for expenditures that were reported on the Schedule A to C-4 report?
- The C-3 report and Schedule A to C-4 report disclosed you deposited \$24,790.75 into the campaign bank account on October 1, 2014, why did you decide to contribute that amount to your campaign? Was it based on any campaign budget projections or part of the campaign plan?

- If October 1, 2014 is the correct deposit date for the contribution, you need to amend the 21-day pre-general election C-4 report to include the deposit in your contribution totals. Please explain why that information was not disclosed on the 21-day pre-general election C-4 report.
- Please describe the nature of the advertisements undertaken through Mr. Hunley (i.e. – direct mail, newspaper; radio or television ads; etc...), and the original vendor(s) names, addresses, and amounts paid by Mr. Hunley for the political advertisements.
- Please describe the “phone poll” such as when it was conducted, by whom, how much it cost. What was the sample size and methodology?
- Please provide copies of the invoices for the political advertisements and “phone poll” undertaken by Mr. Hunley on behalf of the campaign, and also provide a copy of the telephone poll or the script for the calls.

Concerning the \$4,500 in-kind contribution from Gary Ghramm, and disclosure of the costs he incurred to investigate Michael Clay, you reported the description of the work performed for the in-kind contribution from Mr. Ghramm generically as “Services.” Please provide a more detailed description for the in-kind contribution such as “Investigative Services” or “Opposition Research.”

You placed a checkmark in the general election box for the in-kind contribution from Mr. Ghramm, but disclosed that the date received for the in-kind contribution was May 12, 2014. Since the in-kind contribution was received prior to the 2014 primary election being held, the campaign was limited to receiving one in-kind contribution limit of \$950 from Mr. Ghramm

- On what date(s) did you receive from Mr. Ghramm? Did you receive any additional information from Mr. Gramm after the August 5, 2014 primary was held?
- Please amend the C-4 report you filed on February 2, 2015, and: (1) Check the primary election box report for the in-kind contribution from Mr. Ghramm.
- Since Mr. Ghramm was limited to \$950 for his primary election in-kind contribution, please amend the amount you listed for him as an order placed, outstanding debt or obligation by \$950 to \$3,550. In addition, please change the description of the obligation to something like “Reimbursement owed for over-limit in-kind contribution.”

The 2014 election cycle has ended so you are prohibited from receiving contributions from any source other than yourself. If you have not reimbursed Mr. Ghramm by either sending him a personal check, or depositing the personal funds into the campaign bank account and sending him a reimbursement check for the over-limit in-kind contribution, please do so immediately.

Gina Tveit  
PDC Case No. 15-045  
Page -3-

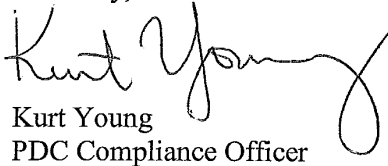
Once you have made the reimbursement, please file an additional C-4 report covering the period 12-11-2014 through the end of February or March of 2015, disclosing the reimbursement you made to Mr. Ghramm using your personal funds, and then check the box for "Final" report.

Please file the amended C-4 report as listed above, and provide a written response to the questions listed above, along with the requested documents and any additional information you want to provide **by March 12, 2015**.

I am aware of your attempts to transmit your PDC electronically using the Online Reporting Campaign Activity (ORCA), so please continue working on electronically filing your campaign finance reports, and let me know once you have successfully transmitted your reports.

Thank you for your attention to this matter, and if you have any questions concerning staff's request, please contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail.

Sincerely,

  
Kurt Young  
PDC Compliance Officer

## Phil Stutzman

---

**From:** Kurt Young  
**Sent:** Wednesday, March 18, 2015 9:21 AM  
**To:** Tony Perkins; Phil Stutzman  
**Subject:** FW: PDC Case No. 15-045

FYI

---

**From:** Gina Tveit [mailto:ginatveit@hotmail.com]  
**Sent:** Tuesday, March 17, 2015 4:14 PM  
**To:** Kurt Young  
**Subject:** RE: PDC Case No. 15-045

Dear Mr. Young,

Below are my responses to the questions that were set forth in your email dated February 23, 2015:

1. My intention was to file my final PDC reports electronically. When I experienced difficulty with this due to an outdated operating system on my personal pc, I filed my final reports on paper and submitted those on February 2, 2015. It was never my intention not to file the reports.
2. Yes, all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed. The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed.
3. The figure of \$24,790.75 was based on campaign expenses incurred, reported on schedule A to C4.
4. The advertisement expenses from Mr. Hanley were for three (3) direct mail postcards sent out starting on the day the general ballots were mailed out to the voters. Stevens County is vote by mail only. I will send you a copy of the invoices.
5. The phone poll was an ID autopoll. The purpose of the poll was to measure name recognition and favorable vs. unfavorable opinion as to my opponent and myself. The poll was sent to the most likely Stevens County voters with landlines. The cost of the poll was \$1250.00. I will send a copy of the script and invoice from the poll.

It might be helpful for your to understand a little bit of the background to 2014 my campaign. I was elected in 2010 to my current position and spent approximately \$10,000 on my campaign. In 2014, my opponent, Michael Clay, ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negativity, which included negative weekly newspaper adverting and negative direct mailings. That is why I consulted with John Hanley of Red Maverick Media. The phone poll was designed to measure name recognition and to try to determine what effect my opponent's constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out. My opponent and I were not on the primary ballot. I never intended to not report my campaign expenses, but I was delayed due to the difficulty I had doing so electronically. In 2010, I was not required to file my reports electronically and I had no understanding of what that would entail.

In addition, I would like you to know that my campaign remained positive throughout. Even though I had very damaging information on my opponent from the results of the private investigator's report, I never used this information in my campaign. Even though I was well aware of my opponent's reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a coy of the report, I immediately forwarded it the WSBA. I felt I had a judicial responsibility to do so but I did not request to be involved as the complainant. As such, I do not receive updates from the bar and I do not know the status of the bar investigation. As far as I a concerned, the information is where it should be and I will let the bar association proceed however they see fit.

Please feel to contact me to discuss this matter further. Once I have provided the information you have requested, it is my intention to proceed with re-filing my reports electronically.

Sincerely,

Gina A. Tveit  
509-680-1206

---

**From:** Kurt Young [<mailto:kurt.young@pdc.wa.gov>]  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** [ginatveit@hotmail.com](mailto:ginatveit@hotmail.com)  
**Subject:** PDC Case No. 15-045

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line



Here is the sample survey script we are working on for your Stevens County Judge...

**Prompt 1:**

Good evening, you have been randomly selected for a short five question issue survey in your area. Thank you for participating.

First, in the upcoming November General Election, how likely are you to vote?

Press 1 for Definitely voting  
Press 2 for Probably voting  
Press 3 for Probably NOT voting  
Press 4 for Definitely NOT voting

#

**Prompt 2:**

Thinking of public figures in your county, do you have a favorable opinion, unfavorable opinion, no opinion, or have you never heard of Michael Clay?

Press 1 for Favorable Opinion  
Press 2 for Unfavorable Opinion  
Press 3 for Heard of, but No Opinion  
Press 4 for Never heard of

#

**Prompt 3:**

Do you have a favorable opinion, unfavorable opinion, no opinion, or have you never heard of Gina Tveit (Ta-WHITE)?

Press 1 for Favorable Opinion  
Press 2 for Unfavorable Opinion  
Press 3 for Heard of, but No Opinion  
Press 4 for Never heard of

#

**Prompt 4:**

If the November Election for Stevens County District Court Judge were being held today, would you vote for Michael Clay or Gina Tveit (Ta-WHITE)?

Press 1 for Michael Clay  
Press 2 for Gina Tveit  
Press 3 for Undecided

#

**Prompt 5:**

And finally are you male or female?

Press 1 for male  
Press 2 for female

#

Thank you. Good Night.



**Invoice**

Red Maverick Media LLC  
403 N. Second Street, FL2  
Harrisburg, PA 17101

Gina Tveit  
669 Pend Oreille Way  
Colville, WA 99114

Date	Rep	Job Code
10/8/2014	JH	14-TVE-001

Qty	Description	Amount
9,045	Tveit Direct Mail Production 001	3,990.00
9,045	Tveit Advance Postage for 001	2,472.00

REVISED!!!! We advanced your postage for you.

Sales Tax (0.0%) \$0.00

Total \$6,462.00



**Invoice**

Red Maverick Media LLC  
403 N. Second Street, FL2  
Harrisburg, PA 17101

Gina Tveit  
669 Pend Oreille Way  
Colville, WA 99114

Date	Rep	Job Code
10/8/2014	JH	14-TVE-002

Qty	Description	Amount
9,045	Tveit Direct Mail Production 002	3,990.00
9,045	Advanced Postage for Tveit 002	2,472.00

REVISED!!! We advanced postage for you!

Sales Tax (0.0%) \$0.00

**Total \$6,462.00**



**Invoice**

Red Maverick Media LLC  
403 N. Second Street, FL2  
Harrisburg, PA 17101

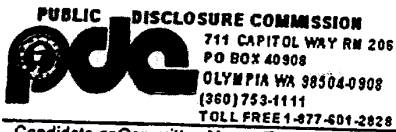
Gina Tveit  
669 Pend Oreille Way  
Colville, WA 99114

Date	Rep	Job Code
10/8/2014	JH	14-TVE-003

Qty	Description	Amount
9,045	Tveit Direct Mail Production 003	3,990.00
9,045	Advanced postage for 003	2,472.00

Sales Tax (0.0%) \$0.00

**Total \$6,462.00**



**CAMPAIGN SUMMARY  
RECEIPTS & EXPENDITURES**

**C4**  
(1/12)

DATE FILED PDC  
FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Include full name)  
Gina A. Treit

Mailing Address  
669 Pend Oreille Loop Colville City

Zip +4  
99114

Office Sought (Candidates)  
District Court Judge

Election Date  
11-4-14

Report Period Covered  
10-14-14 12-10-14

Final Report? Yes  No

\*For PACs, Parties & Caucus Committees: During this report period, did the committee make an independent expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?  
Yes  No

**RECEIPTS**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	<u>\$17,388.55</u>
2. Cash received (From line 2, Schedule A) .....	<u>\$24,790.75</u>
3. In-kind contributions received (From line 1, Schedule B) .....	<u>4,500.00</u>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....	<u>29,290.75</u>
5. Loan principal repayments made (From line 2, Schedule L) .....	<u>( )</u>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-) _____
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-) _____
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....	<u>46,679.30</u>
9. Total pledge payments due (From line 2, Schedule B) .....	<u>( )</u>

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	<u>17,388.55</u>
11. Total cash expenditures (From line 4, Schedule A) .....	<u>24,790.75</u>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	<u>4,500.00</u>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....	<u>24,790.75</u>
14. Loan principal repayments made (From line 2, Schedule L) .....	<u>( )</u>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-) _____
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-) _____
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....	<u>46,790.30</u>

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General election	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:  
509 680-1206

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) .....	<u>0</u>
[Line 18 should equal your bank account balance (s) plus your petty cash balance]	
19. Liabilities: (Sum of loans and debts owed) .....	<u>2600.00</u>
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	<u>-2600.00</u>

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature: Gina A. Treit Date: 1-29-15

Treasurer's Signature: Gina A. Treit Date: 1-29-15

SEE INSTRUCTIONS ON REVERSE

DATE FILED PDC

**CASH RECEIPTS AND EXPENDITURE**

**SCHEDULE A**  
to C4 (104)

FEB -2 2015

Candidate or Committee Name (Do not abbreviate Use full name)

Gino A. Treit

Report Date

12-10-14

1. CASH RECEIPTS (Contributions) which have been reported on C3 List each deposit made since last C4 report was submitted

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10-1-14	\$24,790.75					\$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$

CODES FOR CLASSIFYING EXPENDITURES If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

- C - Contributions (monetary, in-kind & transfers)
- I - Independent Expenditures
- L - Literature, Brochures, Printing
- B - Broadcast Advertising (Radio, TV)
- N - Newspaper and Periodical Advertising
- O - Other Advertising (yard signs, buttons, etc)
- V - Voter Signature Gathering

- P - Postage, Mailing Permits
- S - Surveys and Polls
- F - Fundraising Event Expenses
- T - Travel, Accommodations, Meals
- M - Management/Consulting Services
- W - Wages, Salaries, Benefits
- G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10-1-14	Loon Lake Times	N	Ad	\$ 56
10-3-14	Statesman Examiner	N	Ad	329.50
10-9-14	Statesman Examiner	N	Ad	407.55
10-10-14	Silverado Express	N	Ad	1175.00
10-16-14	Statesman Examiner	N	Ad	407.55
10-22-14	Statesman Examiner	N	Ad	407.55
11-1-14	John Hanley	I/S	Ad/Phone Poll	20,636

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 1,371.60  
Enter also on line 11 of C4 \$ 24,790.75

CODE DEFINITIONS ON NEXT PAGE

**CASH RECEIPTS AND EXPENDITURE**

**SCHEDULE A**  
to C4 (1.04)

FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Use full name.)

*Gina A. Tveit*

Report Date

*12-10-14*

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
						\$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
<i>11-1-14</i>	<i>The Independent</i>	<i>N</i>	<i>Ad</i>	<i>\$ 1371.60</i>

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ *23,419.15*  
Enter also on line 11 of C4 \$ *24,790.75*  
CODE DEFINITIONS ON NEXT PAGE

DATE FILED PDC

**IN KIND CONTRIBUTIONS, PLEDGES,  
ORDERS, DEBTS, OBLIGATIONS**

SCHEDULE  
TO C4

**B**

FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Use full name.)

*Gina A. Tveit*

Report Date

*12-10-14*

**1. IN KIND CONTRIBUTIONS RECEIVED** (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution*	Fair Market Value	Aggregate Total	P R I	G E N	If more than \$100, Employer Name, City, State & Occup.
<i>5-12-14</i>	<i>Gary Ghramm Kellog, ID</i>	<i>Services</i>	<i>\$4500</i>	<i>\$4500</i>			<i>Retired</i>
							Occupation
							Occupation
							Occupation
<input type="checkbox"/> Check here if additional pages are attached.			TOTAL (Enter also on line 3 and line 12 of C4)		<i>4500</i>		

**2. PLEDGES RECEIVED BUT NOT YET PAID.** List each pledge of \$100.00 or more.

Date Notified of Pledge	Name and Address of Pledge Maker	Fair Market Value	Aggregate Total	P R I	G E N	If more than \$100, Employer Name, City, State & Occup.	
						Occupation	
						Occupation	
<input type="checkbox"/> Check here if additional pages are attached.			TOTAL (include new pledges above and all other outstanding pledges.) (Enter also on line 9 of C4)		\$		

**3. ORDERS PLACED, DEBTS, OBLIGATIONS.** If debt is owed to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown of expenses included in the debt. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation*
<i>1-29-15</i>	<i>Gary Ghramm</i>	<i>\$2600</i>	<i>C</i>	<i>Reimbursement</i>
		\$		
		\$		
		\$		
		\$		
		\$		
<input type="checkbox"/> Check here if additional pages are attached.		TOTAL (Include in line 19 of C4)		
		<i>\$2600</i>		

\*SEE NOTE AND CODE DEFINITIONS ON REVERSE







STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH RCW 42.17A

Gina Tveit

Respondent.


PDC Case No. 15-045

Addendum to Report of  
Investigation

**I.**  
**Addendum**

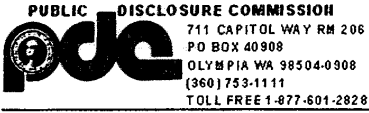
- 1.1 The Campaign filed a combined June and July C-4 report on August 11, 2014, covering the reporting period of June 10 through August 10, 2014. The C-4 report disclosed that \$7,322.42 was received in monetary contributions during this period. A C-3 report totaling \$7,322.42 was also received on August 11, 2014, showing \$6,000 as coming from the candidate's own funds, but not showing a date received, and \$1,322.42 coming from other contributors between July 4 and August 2, 2014. The C-4 report disclosed campaign expenditures totaling \$7,210 during the months of June and July, 2014.
- 1.2 The June 2014 portion of the expenditures totaled \$6,551. The June expenditures included: (1) Three expenditures to Stick-It Signs totaling \$4,767; (2) An \$872 expenditure to Campaign Pros for political advertisements in form of pens and notebooks; and (3) A \$543 expenditures to Colville Printing for campaign brochures. A June C-4 report was due by July 10, 2014, and the expenditures required to be disclosed on this report were filed 32 days late. **(Exhibit 1 to Addendum)**
- 1.3 The Campaign filed its C-3 and C-4 reports manually, on paper, rather than by the required electronic method. The Campaign did not request an exemption from the electronic filing requirement. On November 4, 2014, PDC staff sent a warning letter to Ms. Tveit stating that the required reports must be filed electronically to avoid enforcement action and a possible monetary penalty. **(Exhibit 2 to Addendum)**

Respectfully submitted this 9<sup>th</sup> day of July, 2015.

  
Kurt Young  
PDC Compliance Officer

**Exhibits to Addendum**

- Exhibit 1** C-4 report for period June 10 – August 10, 2014, and C-3 report filed August 11, 2014.
- Exhibit 2** Warning letter dated November 6, 2014 for missing electronic PDC reports



**CAMPAIGN SUMMARY  
RECEIPTS & EXPENDITURES**

**C4**  
(1/12)

PDC OFFICE USE

DATE FILED PDC

AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Include full name)  
Gina A. Tveit

Mailing Address  
669 Pend Oreille Loop Colville

Zip +4  
99114

Office Sought (Candidates)  
District Court Judge

Election Date  
11-4-14

Report Period Covered  
6-10-14 8-10-14

Final Report? Yes  No

\*For PACs, Parties & Caucus Committees: During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)  
Yes  No

**RECEIPTS**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... \$ 5000.00
2. Cash received (From line 2, Schedule A) ..... \$ 1322.42
3. In kind contributions received (From line 1, Schedule B) .....
4. Total cash and in kind contributions received this period (Line 2 plus 3) ..... 1322.42
5. Loan principal repayments made (From line 2, Schedule L) ..... ( )
6. Corrections (From line 1 or 3, Schedule C) ..... Show + or (-) .....
7. Net adjustments this period (Combine line 5 & 6) ..... Show + or (-) .....
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) ..... 6000 + 6322.42
9. Total pledge payments due (From line 2, Schedule B) ..... = 12,322.42

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... 4862.44
11. Total cash expenditures (From line 4, Schedule A) ..... 7210.27
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) ..... 7210.27
14. Loan principal repayments made (From line 2, Schedule L) ..... ( )
15. Corrections (From line 2 or 3, Schedule C) ..... Show + or (-) .....
16. Net adjustments this period (Combine lines 14 & 15) ..... Show + or (-) .....
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) ..... 12,072.71

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:  
509 680-1206

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) ..... 249.71  
(Line 18 should equal your bank account balance(s) plus your petty cash balance.)

19. Liabilities: (Sum of loans and debts owed) ..... ( )

20. Balance (Surplus or deficit) (Line 18 minus line 19) .....

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature <u>Gina A. Tveit</u>	Date <u>8-10-14</u>	Treasurer's Signature <u>Gina A. Tveit</u>	Date <u>8-10-14</u>
---	------------------------	---	------------------------

SEE INSTRUCTIONS ON REVERSE

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**  
to C4  
(1.04)

8-10-14  
READY FILED PDC  
AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Use full name.)

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount

Total deposits \$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 1322.42

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

- C - Contributions (monetary, in-kind & transfers)
- I - Independent Expenditures
- L - Literature, Brochures, Printing
- B - Broadcast Advertising (Radio, TV)
- N - Newspaper and Periodical Advertising
- O - Other Advertising (yard signs, buttons, etc.)
- V - Voter Signature Gathering

- P - Postage, Mailing Permits
- S - Surveys and Polls
- F - Fundraising Event Expenses
- T - Travel, Accommodations, Meals
- M - Management/Consulting Services
- W - Wages, Salaries, Benefits
- G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	140.00
6-19-14	Stick-it Signs	O	Signs	\$1657.04
6-30-14	Stick-it Signs	O	Signs	2078.13
7-11-14	Grandma Deenies	O	Candy	100.00
6-24-14	Campaign Pros 5200 SW 30th St. Davenport, IA 52802	O	Pens/Not pads	871.94
7-4-14	Go Daddy.com	O	webhosting/ domain registration	122.42

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 2240.74  
Enter also on line 11 of C4 \$ 7210.27

CODE DEFINITIONS ON NEXT PAGE

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**  
to C4  
(1.04)

8-10-14  
Report Date

Candidate or Committee Name (Do not abbreviate. Use full name.)

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

DATE FILED PDC

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount

Total deposits  
\$ AUG 11 2014

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 1322.42

CODES FOR CLASSIFYING EXPENDITURE: If one of the following codes is used to describe an expenditure, no other description is generally needed.

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- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES

- Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
6-23-14	Colville Printing P.O. Box 88, Colville, WA	L	Brochures	\$ 543.38
7-2-14	The Independent P.O. Box 5 Chewelah, WA BGR	N	Ad	183.60
6-15-14	1150 S. Main Colville, WA 99114	O	Posts, supplies	207.61
7-23-14	Colville Printing	L	Brochures	114.33
6-9-14	UPS store 1250 N. Hwy Colville, WA 99114	O	Mailbox	95.38
6-11-14	Stick-It Signs	O	Signs	1031.88
6-17-14	Stick-It Signs 672 S. Main Colville, WA 99114	O	Signs	64.56

Total from attached pages \$ 4969.53

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 7210.27

CODE DEFINITIONS ON NEXT PAGE

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Use full name.)  
*Gina A. Tveit*

Mailing Address  
*609 Pend Oreille Loop*

City *Colville, WA* Zip *99114* Office Sought (candidates) *D.G. Judge* Election Date *11-4-14*

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous .....	\$	\$
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	<i>6000.00</i>	<i>6000.00</i>
c. Loans, notes, security agreements. Attach Schedule L .....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
<i>7-4-14</i>	<i>Stephen Graham 1312 N. Monroe Spokane, WA 99114</i>	<i>self</i> <i>Occupation attorney</i>			<i>\$ 122.42</i>	
<i>7-10-14</i>	<i>Whitty's Southtown 841 S. Main Colville, WA 99114</i>				<i>\$ 50.00</i>	
<i>7-20-14</i>	<i>John W. Goldsmith P.O. Box 152 Colville, WA 99114</i>	<i>Occupation retired</i>			<i>\$ 250.00</i>	
<i>8-1-14</i>	<i>Betty Koller 372 Bastien Lane Colville, WA 99114</i>	<i>Occupation retired</i>			<i>\$ 400.00</i>	
<i>8-2-14</i>	<i>James Harvie 3353 Highway 25S. Gifford, WA 99131</i>	<i>Occupation retired</i>			<i>\$ 500.00</i>	
					<b>Sub-total</b> <i>1322.42</i>	

Check here if additional pages are attached

Amount from attached pages

\*See reverse for details.

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

*7322.42*

4. Date of Deposit

*8-8-14*

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Treasurer's Daytime Telephone No.:

*(509) 680-1206*

*Gina A. Tveit*

*8-10-14*



## PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111  
Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

November 6, 2014

JUDGEGINATVEIT@GMAIL.COM

GINA TVEIT  
669 PEND OREILLE LOOP  
COLVILLE WA 99114

**Subject: Warning Letter for Missing Electronic PDC Reports**

Dear GINA TVEIT :

**YOUR REQUIRED ELECTRONIC PDC REPORTS FOR 2014 ARE PAST DUE.** Our records indicate that you are registered with the Public Disclosure Commission (PDC) as a candidate, that you incurred expenditures totaling more than \$5,000 on or before November 6, 2014, and that you have not begun to file your C-3 and C-4 reports electronically, as required by law, RCW 42.17A.245 and WAC 390-19-030. Your campaign must be brought into compliance with the electronic filing requirement by the next C-4 due date of December 10, 2014. Failure to do so may result in enforcement action. As of today the PDC has not received your electronic financial disclosure reports. The required reports must be filed electronically even if you lost the election.

**TO AVOID ENFORCEMENT ACTION AND A POSSIBLE MONETARY PENALTY, you must electronically file the missing reports by Wednesday, December 10, 2014.** This is the only formal warning notice you will receive regarding this matter. If the missing reports are not received by **December 10**, we may schedule a hearing that could result in a monetary penalty.

**PDC CANNOT ACCEPT FAXED, SCANNED, OR EMAILED REPORTS.**

If you have questions about filing the missing reports please refer to the enclosed pamphlet or contact us for assistance at one of the numbers listed below. Thank you for your prompt attention to this matter.

PDC Staff

**For PDC Filer Assistance:**

- (360) 753-1111
- Toll Free 1-877-601-2828
- E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)



1  
2  
3  
4  
5  
6  
7 **BEFORE THE PUBLIC DISCLOSURE COMMISSION**  
8 **OF THE STATE OF WASHINGTON**

9 IN RE THE MATTER OF  
10 ENFORCEMENT ACTION AGAINST

11 Gina Tveit

12 Respondent.

PDC CASE NO. 15-045

PUBLIC DISCLOSURE  
COMMISSION STAFF'S WITNESS  
AND EXHIBIT LIST

13 The Public Disclosure Commission Staff (Commission Staff), through their  
14 undersigned counsel, submit this list of witnesses that may be called and exhibits that will be  
15 used at the hearing currently scheduled for August 27, 2015. The Commission Staff reserve  
16 the right to call witnesses identified by Respondent Gina Tveit and to use exhibits proposed by  
17 the Respondent as part of the Commission Staff's case in chief or in rebuttal.

18 **I. WITNESSES**

- 19 1. Mr. Tony Perkins, Interim Compliance Director  
20 Public Disclosure Commission  
21 711 Capitol Way  
22 P.O. Box 40908  
Olympia, WA 98504-0908  
(360) 586-1042


23 Mr. Perkins will testify about the Commission Staff's investigation of the facts alleged  
24 in the Notice of Administrative Charges, including but not limited to his communications with  
25 the Respondent.



1 10. Report of Investigation and Addendum to Report of Investigation (12 pages).

2  
3 DATED this 19<sup>th</sup> day of August, 2015.

4 ROBERT W. FERGUSON  
Attorney General

5  
6   
7 CHAD C. STANDIFER, WSBA #29724  
Assistant Attorney General  
Attorneys for Commission Staff

8  
9  
10  
11  
12  
13 **PROOF OF SERVICE**

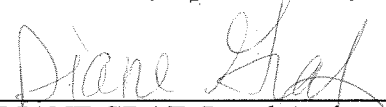
14 I certify that I served a true and correct copy of this document with exhibits on all  
15 parties or their counsel of record on the date below as follows:

16 JERRY MOBERG  
17 JERRY MOBERG & ASSOC.  
18 PO BOX 130  
19 EPHRATA, WA 98823

- U.S. Mail via state Consolidated Mail Service (with proper postage affixed)  
 Courtesy copy via facsimile:  
 via electronic mail:  
JMOBERG@JMLAWPS.COM  
 ABC/Legal Messenger

20  
21  
22 I declare under penalty of perjury under the laws of the state of Washington that the  
23 foregoing is true and correct.

24 DATED this 19<sup>th</sup> day of August, 2015, at Olympia, Washington.


25   
26 DIANE GRAF, Legal Assistant

# EXHIBIT 1

RECEIVED

MAY -8 2014

Office Use Only: No. \_\_\_\_\_

Public Disclosure Commission
 <b>WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION</b> <b>COMPLAINT FORM</b> (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*

Judge Gina Tveit

Stevens County District Court

215 South Oak Room 213

Colville, Washington 99114 509-684-5249

**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.)

**I gave notice no later than February 13, 2014 to the Public Disclosure Commission that I am a candidate for Stevens County District Court Judge.**

RCW 42.17A005(7) indicates that a candidate is any individual who seeks nomination to public office. A person becomes a candidate when the person makes expenditures to promote his or her campaign. Once this happens RCW 42.17A.235 as well as other chapter statues create reporting requirements.

My allegation is that Judge Gina Tveit hired a private investigator no later than February 10, 2014 to investigate myself once she became aware that I was seriously considering challenging her in the November 2014 general election. This was done in an attempt to dig up dirt on myself and or attempt to scare me into not running against her. As of May 8<sup>th</sup> Judge Tveit has filed nothing with the Washington State Public Disclose Commission. It is my opinion that Judge Tveit's failure to comply with Washington Election law is not deminimus but in fact is a material breach of her duty to follow the laws of this state.

RECEIVED

**Evidence and Witnesses**

MAY -8 2014

Public Disclosure Commission

**3. EVIDENCE:**

In early J

**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.**

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

In early January 2014 I was advised by a member of the Stevens County Superior Court that Judge Gina Tveit had gone to the Superior Court Clerk's Office to obtain copies of my 2 divorce files in Stevens County. I later confirmed this with the elected clerk Patricia Chester. I was also informed by Ms. Chester that there was no record of Judge Tveit paying the normal costs associated with this request. Failure to pay the costs associated with producing those records appears to be a violation of the Code of Judicial Conduct. CJC Rule 4.1 (A) (9). While a Public Disclosure Complaint is not the proper venue to investigate a violation of the Code of Judicial Conduct the information is offered as evidence of Judge Tveit's intent.

In early February I began receiving phone calls from woman I had previously dated including an ex-wife who indicated they were contacted by a private investigator. The investigator gave his name as Ted Pulver. Mr. Pulver gave vague answers when asked who he was working for. On May 6, 2014 I met with Kip Hill who is an investigative reporter with the Spokane newspaper. Mr. Hill told me he was contacted by Mr. Pulver regarding some woman I had previously dated. I was informed by the investigative reporter that Mr. Pulver indicated that he was hired by Judge Gina Tveit.

There is only one possible explanation for Judge Tveit conduct. Clearly Judge Tveit was intending to further her campaign to be reelected Stevens County District Court Judge. Hiring Mr. Pulver in an attempt to run a smear campaign against me is a clear campaign expenditure. Judge Tveit had a duty under Washington law to report the expenditure.

**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.**

*Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.*

Please see above;

Ted Pulver can be reached on 208-773-3211

RECEIVED

MAY - 8 2014

Kip Hill can be reached on 509-459-5420

Public Disclosure Commission

Patricia Chester can be reached on 509-684-7575

**Certification**

**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) **Michael E. Clay**

Street address **107 North Main Suite 2**

City, state and zip code **Colville, Washington 99114**

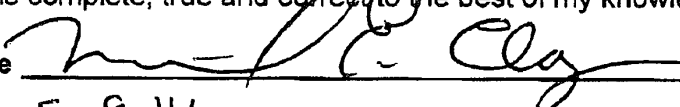
Telephone number (including area code) **509-684-8780**

E-mail address (optional) **Lawofficesofmikeclay@yahoo.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 

Date signed 5-8-14

Place signed (city and county)  
**Colville, Washington**

**Stevens**

City

County

# EXHIBIT 2





711 CAPITOL WAY RM 206  
PO BOX 40908  
OLYMPIA WA 98504-0908  
(360) 753-1111  
Toll Free 1-877-601-2828

# Candidate Registration

**C1**  
(1/2008)

100580808

05-24-2014

Candidate's Name (Give candidate's full name.)

GINA A TVEIT

Telephone Number

509-680-1206

Candidate's Committee Name (Do not abbreviate.)

COMMITTEE TO ELECT JUDGE GINA TVEIT

Fax Number

Mailing Address

669 PEND OREILLE LOOP

Candidate's E-Mail Address

JUDGEGINATVEIT@GMAIL.COM

City

County

Zip + 4

COLVILLE

STEVENS

99114

Campaign E-Mail Address

judgeginatveit@gmail.com

1. What office are you running for?

Legislative District, County or City

Position No.

Do you now hold this office?

DISTRICT COURT JUDGE

STEVENS CO DISTRICT COURT

NA

Yes

No

2. Political party (if partisan office)

NON PARTISAN

3. Date of general or special election

11-04-2014

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 X. See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet.

Continued on attached sheet.

GINA A TVEIT

669 PEND OREILLE LOOP, COLVILLE WA 99114

Daytime Telephone Number

509-680-1206

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."

PHIL STALP, CAMPAIGN MANAGER, 685 S. MINER, COLVILLE WA 99114

Continued on attached sheet.

8. Campaign Bank or Depository

Branch

City

KEY BANK

COLVILLE

COLVILLE

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

669 PEND OREILLE LOOP, COLVILLE

In order to make an appointment, contact the campaign at (telephone, fax, e-mail): 509-680-1206 JUDGEGINATVEIT@GMAIL.COM

11. CERTIFICATION:

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

Candidate's Signature

GINA A TVEIT

Date

05-24-2014

# EXHIBIT 3

## Jon Ammons

---

**From:** gina tveit <ginatveit@hotmail.com>  
**Sent:** Thursday, May 29, 2014 10:13 PM  
**To:** PDC  
**Attachments:** IMG\_0001.jpg; IMG\_0002.jpg; IMG\_0003.jpg; IMG\_0004.jpg; IMG\_0005.jpg; IMG\_0006.jpg; IMG\_0007.jpg; IMG\_0008.jpg; IMG\_0009.jpg

May 29, 2014  
Public Disclosure Commission  
711 Capitol Way Room 206  
P.O. Box 40908  
Olympia, WA 998504-0908  
Re: T14-104

Dear Mr. Stutzman,

Please be advised that I filed a Declaration of Candidacy with the Stevens County Auditor for the position of District Court Judge on May 12, 2014. I subsequently submitted my Candidate Registration for filing with the PDC on May 21, 2014.

I will first respond to the allegation that I obtained public records from Superior Court files without paying for them. In the afternoon of Friday December 6, 2013, I went to the Superior Court Clerk's office. I stood in line at the public window. There was someone in front of me being assisted and I waited my turn. I then handed the deputy clerk, Jenna Bourgeau, a piece of paper containing 5 case numbers and said I wished to check out these files and take them home for the weekend. For the past 25 years that I have worked in the legal field, this is common practice and procedure for members of the legal community. The clerk stated that she could just "email" the files rather than pulling them and physically giving them to me. I told her that I was not familiar with that process and I wasn't even sure which documents I would want to look at from each file. She stated that she would simply email the entire file. I made it very clear that this was a personal request and not work related. If she wanted to email the files to me she would have to send them to my personal email account and not my county email account. I wrote my personal email account down on the same piece of paper that I had given to her with the case file numbers. I further told the clerk that I would not be able to retrieve the email until after I got home. AT NO TIME DID THE DEPUTY CLERK INFORM ME THAT THERE WAS A FEE DUE FOR MY REQUEST. In fact, if she had simply pulled the files as I had requested, there would be no fee incurred. AT NO TIME UP TO AND INCLUDING THE PRESENT DATE AND TIME, HAS ANYONE FROM THE CLERK'S OFFICE REQUESTED THAT I PAY A FEE. After receiving this complaint, I did contact the elected Superior Court Clerk, Patricia Chester. She indicated that she did receive a phone call from Mike Clay asking whether or not I had checked out files and paid a fee. After checking with her staff, she confirmed to Clay that I had checked out files and had not paid a fee. Ms. Chester indicated to me that she did not think I had done anything improper and she would write a statement to that effect. I also stated to her that if a fee was owed I certainly would pay it. Ms. Chester told me that she would get back to me with her statement and let me know what amount, if any, was owed. As to whether or not someone from the clerk's office advised Clay that I had obtained these files, Ms. Chester was unaware of that. There wouldn't seem to be any legitimate reason for that to occur. The files that I requested were the files that are listed on the *Inside Courts* public website under Clay's name. The files are three of his divorce files and two criminal files. I am attaching copies of the email(s) I received from the deputy clerk with the attached files sent to my personal Hotmail account.

Secondly, I will respond to the allegation regarding the private investigator. Sometime in the winter of 2013, my father and I discussed the rumor that Mike Clay was considering running for District Court Judge. For years there has been widespread gossip in the community regarding Mike Clay's inappropriate relationships with women involved in the court cases he was handling, either as a deputy prosecutor or a contracted public

defender. My father expressed to me great concern regarding these allegations and he contacted Ted Pulver for the purpose of either confirming or denying these rumors. The fact is, Mr. Pulver's investigation revealed very serious allegations of professional misconduct, perhaps even criminal conduct. When the report was completed in April 2014, I felt that I had an obligation under the Judicial Code of Conduct to forward the report to the Bar Association, which I did do. As far as I'm concerned, the report is in the appropriate hands and that is where the matter needs to remain. I have no intentions of using the information contained in the report during my campaign. I can truly say that I had never considered this a campaign expenditure, which commonly would include expenses for such items as campaign signs, advertising, brochures, etc.

I am also attaching copies of three (3) letters received from Mike Clay indicating that as of April 2013 he had moved to Western Washington. I have never received any information indicating that he had actually returned to Stevens County and I honestly don't even know when that occurred.

In conclusion, I have always had every intention of being in compliance with the PDC requirements. I would like the opportunity to do some additional research and to talk with PDC staff with my questions. I am asking for one additional week.

Thank you for your consideration.

Sincerely,

Gina A. Tveit

Print

Close

**Case # 00-3-01437-4**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)  
Sent: Fri 12/06/13 10:34 PM  
To: ginatveit@hotmail.com (ginatveit@hotmail.com)

I tried looking this case up in SCOMIS but I couldn't find anything... This might be in a different county.

Have a great weekend ☺

*Jenna Bourgeau*

*Deputy Clerk*

*Superior Court*

*215 S. Oak Room 206*

*Colville, WA 99114*

*(509) 684-3481*

[Print](#)

[Close](#)

**Case # 09-3-00079-6**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:28 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

6 attachments

CC000001.TIF (96.1 KB) , CC000002.TIF (129.5 KB) , CC000003.TIF (355.5 KB) ,  
CC000004.TIF (250.0 KB) , CC000005.TIF (183.5 KB) , CC000006.TIF (107.5 KB)

[Print](#)

[Close](#)

## Case # 12-1-00086-1

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:28 PM

To: [ginatveit@hotmail.com](mailto:ginatveit@hotmail.com) ([ginatveit@hotmail.com](mailto:ginatveit@hotmail.com))

38 attachments

CC000001.TIF (139.6 KB) , CC000002.TIF (307.6 KB) , CC000003.TIF (254.2 KB) ,  
CC000004.TIF (47.1 KB) , CC000005.TIF (53.1 KB) , CC000006.TIF (77.5 KB) ,  
CC000007.TIF (91.9 KB) , CC000008.TIF (74.9 KB) , CC000009.TIF (86.1 KB) ,  
CC000010.TIF (104.4 KB) , CC000011.TIF (69.7 KB) , CC000012.TIF (49.6 KB) ,  
CC000013.TIF (197.3 KB) , CC000014.TIF (83.8 KB) , CC000015.TIF (68.2 KB) ,  
CC000016.TIF (46.8 KB) , CC000017.TIF (137.0 KB) , CC000018.TIF (66.6 KB) ,  
CC000019.TIF (329.6 KB) , CC000020.TIF (78.6 KB) , CC000021.TIF (234.4 KB) ,  
CC000022.TIF (48.9 KB) , CC000023.TIF (84.2 KB) , CC000024.TIF (71.3 KB) ,  
CC000025.TIF (126.9 KB) , CC000026.TIF (50.9 KB) , CC000027.TIF (90.9 KB) ,  
CC000028.TIF (50.2 KB) , CC000029.TIF (90.2 KB) , CC000030.TIF (45.2 KB) ,  
CC000031.TIF (66.8 KB) , CC000032.TIF (64.8 KB) , CC000033.TIF (271.4 KB) ,  
CC000034.TIF (683.4 KB) , CC000035.TIF (755.8 KB) , CC000036.TIF (55.2 KB) ,  
CC000037.TIF (88.7 KB) , CC000038.TIF (95.1 KB)

[Print](#)

[Close](#)

## Case # 12-1-00158-2

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:26 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

44 attachments

CC000001.TIF (153.7 KB), CC000002.TIF (328.0 KB), CC000003.TIF (232.4 KB),  
CC000004.TIF (80.4 KB), CC000005.TIF (108.4 KB), CC000006.TIF (113.5 KB),  
CC000007.TIF (66.2 KB), CC000008.TIF (448.2 KB), CC000009.TIF (109.8 KB),  
CC000010.TIF (182.0 KB), CC000011.TIF (90.0 KB), CC000012.TIF (98.2 KB),  
CC000013.TIF (339.5 KB), CC000014.TIF (51.6 KB), CC000015.TIF (88.0 KB),  
CC000016.TIF (71.7 KB), CC000017.TIF (123.2 KB), CC000018.TIF (405.4 KB),  
CC000019.TIF (51.0 KB), CC000020.TIF (40.6 KB), CC000021.TIF (48.8 KB),  
CC000022.TIF (94.9 KB), CC000023.TIF (41.3 KB), CC000024.TIF (48.5 KB),  
CC000025.TIF (87.5 KB), CC000026.TIF (93.0 KB), CC000027.TIF (89.4 KB),  
CC000028.TIF (102.9 KB), CC000029.TIF (111.0 KB), CC000030.TIF (211.5 KB),  
CC000031.TIF (97.0 KB), CC000032.TIF (593.6 KB), CC000033.TIF (84.9 KB),  
CC000034.TIF (161.8 KB), CC000035.TIF (69.8 KB), CC000036.TIF (88.4 KB),  
CC000037.TIF (72.3 KB), CC000038.TIF (292.7 KB), CC000039.TIF (684.1 KB),  
CC000040.TIF (1107.5 KB), CC000041.TIF (91.6 KB), CC000042.TIF (54.3 KB),  
CC000043.TIF (87.9 KB), CC000044.TIF (89.9 KB)



[Print](#)

[Close](#)

**Case # 04-3-00262-3**

From: **Jenna L. Bourgeau** (jbourgeau@co.stevens.wa.us)

Sent: Fri 12/06/13 10:30 PM

To: ginatveit@hotmail.com (ginatveit@hotmail.com)

7 attachments

CC000001.TIF (399.2 KB) , CC000002.TIF (37.3 KB) , CC000003.TIF (50.3 KB) ,  
CC000004.TIF (35.4 KB) , CC000005.TIF (53.4 KB) , CC000006.TIF (436.1 KB) ,  
CC000007.TIF (403.9 KB)

*LAW OFFICE OF  
MICHAEL E. CLAY*

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---

Michael E. Clay, Attorney At

Stevens County Commissioners  
215 South Oak  
Colville, Washington 99114

September 28, 2012

Re: Notice of resignation

Dear Commissioners,


Due to recent family medical issues regarding my mother who suffers from Alzheimer's disease and who now resides with me I have decided to resign my position as a Court appointed attorney for District Court.

I regret having to make this decision however I feel that it is best for my family as well as my client's.

I want to express my deep gratitude for being able to serve District Court as a court appointed attorney for the last six years. I understand pursuant to paragraph 13 section "c", of my District Court contract, that this resignation will be effective at the end of December 2012 and that I am responsible for the completion of all cases assigned prior to December 31, 2012.

I do not anticipate that these family issues will have any effect on the other criminal defense contracts I have with Stevens County.

Sincerely,

  
Michael Clay  
Attorney

cc Judge Gina Tveit  
cc Prosecutor Tim Rasmussen

**LAW OFFICE OF  
MICHAEL E. CLAY**

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---



December 31, 2012

Stevens County Commissioners  
215 South Oak  
Colville, WA 99114

RE: Notice of Resignation / Withdrawal

Dear Commissioners,

I am withdrawing my resignation from the District Court Contract that was given to you on September 28, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Clay".

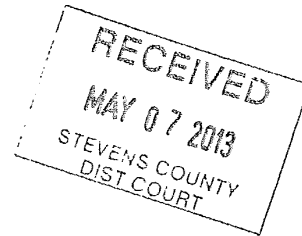
Michael E. Clay  
Attorney At Law

cc Lloyd Nickel  
cc Gina Tveit

**LAW OFFICE OF  
MICHAEL E. CLAY**

*115 West Astor  
Suite 206  
Colville, Washington 99114  
(509) 684-8780  
Fax (509) 684-8781*

---



April 25, 2013

To: Stevens County Superior Court  
Stevens County Juvenile Court  
Stevens County District Court  
Chewelah Municipal Court  
Kettle Falls Municipal Court

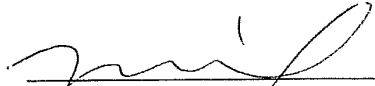
As you may be aware, I have recently married and will be relocating my residence and my legal practice to Western Washington. I currently have several indigent defense contracts within Stevens County which provide that my portion of each contract may be assigned to another competent attorney. I believe that I have located a suitable attorney to take over my place on these contracts.

Michael Golden is currently a deputy prosecuting attorney in Ferry County. He has been a lawyer since 1996 and has worked as a prosecutor since 2002. In the two years he has worked in Ferry County, I have had the opportunity to observe his demeanor, ability and work ethic, and I believe he would be an excellent choice to replace me on these contracts. Mr. Golden is committed to remaining in this area. He has purchased a home near Colville where he, his wife and their two children reside. His wife operates a business in downtown Colville, and their two children attend Colville Schools. I have met with Mr. Golden, and he is willing to take over these contracts on the dates indicated below.

With all this in mind, and pursuant to the contract assignment provisions, I hereby assign my portion of the Superior Court, District Court and initial appearance contracts to attorney Michael Golden, WSBA# 26128, effective June 1, 2013.. This also serves as assignment of my portion of the Chewelah and Kettle Falls conflicts indigent defense contract to Mr. Golden, effective June 1, 2013. I also assign my portion of the Juvenile indigent defense contract to Michael Golden at a date to be determined later if I decide to give up the Juvenile contract.

With the exception of the juvenile contract, as of the dates set forth above, Mr. Golden will be substituted in as counsel of record on all cases subject to these contracts, and all new assignments after those dates of assignment will be assigned to Mr. Golden.

I will do my best to help ensure a smooth transition of services to minimize any disruption that may be caused by this assignment. If you have any questions or concerns, please do not hesitate to contact me directly at (509) 684-8780.



Mike Clay

cc: DPA Lloyd Nichol, Michael Golden, Bob Simone, Paul Wasson, Melissa May, Jim Irwin, Dee Hokom, Josh Gilstrap, Gary Weber

# EXHIBIT 4

## Kurt Young

---

**From:** Gina Tveit <ginatveit@hotmail.com>  
**Sent:** Tuesday, March 17, 2015 4:14 PM  
**To:** Kurt Young  
**Subject:** RE: PDC Case No. 15-045

Dear Mr. Young,

Below are my responses to the questions that were set forth in your email dated February 23, 2015:

1. My intention was to file my final PDC reports electronically. When I experienced difficulty with this due to an outdated operating system on my personal pc, I filed my final reports on paper and submitted those on February 2, 2015. It was never my intention not to file the reports.
2. Yes, all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed. The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed.
3. The figure of \$24,790.75 was based on campaign expenses incurred, reported on schedule A to C4.
4. The advertisement expenses from Mr. Hanley were for three (3) direct mail postcards sent out starting on the day the general ballots were mailed out to the voters. Stevens County is vote by mail only. I will send you a copy of the invoices.
5. The phone poll was an ID autopoll. The purpose of the poll was to measure name recognition and favorable vs. unfavorable opinion as to my opponent and myself. The poll was sent to the most likely Stevens County voters with landlines. The cost of the poll was \$1250.00. I will send a copy of the script and invoice from the poll.

It might be helpful for your to understand a little bit of the background to 2014 my campaign. I was elected in 2010 to my current position and spent approximately \$10,000 on my campaign. In 2014, my opponent, Michael Clay, ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negatively, which included negative weekly newspaper adverting and negative direct mailings. That is why I consulted with John Hanley of Red Maverick Media. The phone poll was designed to measure name recognition and to try to determine what effect my opponent's constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out. My opponent and I were not on the primary ballot. I never intended to not report my campaign expenses, but I was delayed due to the difficulty I had doing so electronically. In 2010, I was not required to file my reports electronically and I had no understanding of what that would entail.

In addition, I would like you to know that my campaign remained positive throughout. Even though I had very damaging information on my opponent from the results of the private investigator's report, I never used this information in my campaign. Even though I was well aware of my opponent's reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a coy of the report, I immediately forwarded it the WSBA. I felt I had a judicial responsibility to do so but I did not request to be involved as the complainant. As such, I do not receive updates from the bar and I do not know the status of the bar investigation. As far as I a concerned, the information is where it should be and I will let the bar association proceed however they see fit.

Please feel to contact me to discuss this matter further. Once I have provided the information you have requested, it is my intention to proceed with re-filing my reports electronically.

Sincerely,

Gina A. Tveit  
509-680-1206

---

**From:** Kurt Young [mailto:kurt.young@pdc.wa.gov]  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** ginatveit@hotmail.com  
**Subject:** PDC Case No. 15-045

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line



## **Kurt Young**

---

**From:** Kurt Young  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** 'ginatveit@hotmail.com'  
**Subject:** PDC Case No. 15-045  
**Attachments:** Gina Tveit - Request for information ltr.pdf

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

February 23, 2015

THE HONORABLE GINA TVEIT (Sent by email to: [ginatveit@hotmail.com](mailto:ginatveit@hotmail.com))  
669 PEND OREILLE LOOP  
COLVILLE WA 99114

Subject: Request for additional information; PDC Case No. 15-045

Dear Judge Tveit:

The Public Disclosure Commission (PDC) is in receipt of the Campaign Summary Contributions and Expenditures report (C-4 report) and Monetary Contributions report (C-3 report) you filed on February 2, 2015. PDC staff reviewed the C-3 and C-4 reports you submitted manually on paper, and found you filed a C-4 report on October 14, 2014 on paper covering the period September 10 through October 13, 2014, and then it appears you stopped filing until after staff logged in the complaint filed by Mr. Clay.

The C-4 report you submitted on February 2, 2015, stated that it covered the period October 14 through December 10, 2014, but disclosed information dating back to October 1, 2014, so the dates covered by the 21-day pre-general election C-4 report and the 7-day pre-general election C-4 report overlapped one another.

Staff is following-up on the information you disclosed on those C-3 and C-4 reports, the allegations listed in the complaint, and your prior correspondence with PDC staff concerning the following three issues: (1) Late-filed campaign finance reports and the information disclosed on those reports; (2) Receipt of over-limit in-kind contributions from Gary Ghramm; and (3) Details concerning the telephone poll or survey calls undertaken on behalf of your campaign. Concerning the February 2, 2015 reports:

- Please explain why you stopped filing PDC reports on paper prior to the election.
- Did you make a \$24,790.75 monetary contribution using personal funds to your campaign on October 1, 2014, and deposit those funds into the campaign bank account? Did you write any personal checks for expenditures that were reported on the Schedule A to C-4 report?
- The C-3 report and Schedule A to C-4 report disclosed you deposited \$24,790.75 into the campaign bank account on October 1, 2014, why did you decide to contribute that amount to your campaign? Was it based on any campaign budget projections or part of the campaign plan?

- If October 1, 2014 is the correct deposit date for the contribution, you need to amend the 21-day pre-general election C-4 report to include the deposit in your contribution totals. Please explain why that information was not disclosed on the 21-day pre-general election C-4 report.
- Please describe the nature of the advertisements undertaken through Mr. Hunley (i.e. – direct mail, newspaper; radio or television ads; etc...), and the original vendor(s) names, addresses, and amounts paid by Mr. Hunley for the political advertisements.
- Please describe the “phone poll” such as when it was conducted, by whom, how much it cost. What was the sample size and methodology?
- Please provide copies of the invoices for the political advertisements and “phone poll” undertaken by Mr. Hunley on behalf of the campaign, and also provide a copy of the telephone poll or the script for the calls.

Concerning the \$4,500 in-kind contribution from Gary Ghramm, and disclosure of the costs he incurred to investigate Michael Clay, you reported the description of the work performed for the in-kind contribution from Mr. Ghramm generically as “Services.” Please provide a more detailed description for the in-kind contribution such as “Investigative Services” or “Opposition Research.”

You placed a checkmark in the general election box for the in-kind contribution from Mr. Ghramm, but disclosed that the date received for the in-kind contribution was May 12, 2014. Since the in-kind contribution was received prior to the 2014 primary election being held, the campaign was limited to receiving one in-kind contribution limit of \$950 from Mr. Ghramm

- On what date(s) did you receive from Mr. Ghramm? Did you receive any additional information from Mr. Gramm after the August 5, 2014 primary was held?
- Please amend the C-4 report you filed on February 2, 2015, and: (1) Check the primary election box report for the in-kind contribution from Mr. Ghramm.
- Since Mr. Ghramm was limited to \$950 for his primary election in-kind contribution, please amend the amount you listed for him as an order placed, outstanding debt or obligation by \$950 to \$3,550. In addition, please change the description of the obligation to something like “Reimbursement owed for over-limit in-kind contribution.”

The 2014 election cycle has ended so you are prohibited from receiving contributions from any source other than yourself. If you have not reimbursed Mr. Ghramm by either sending him a personal check, or depositing the personal funds into the campaign bank account and sending him a reimbursement check for the over-limit in-kind contribution, please do so immediately.

Gina Tveit  
PDC Case No. 15-045  
Page -3-

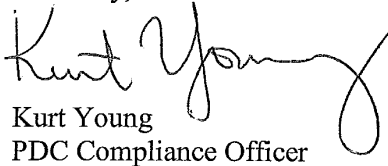
Once you have made the reimbursement, please file an additional C-4 report covering the period 12-11-2014 through the end of February or March of 2015, disclosing the reimbursement you made to Mr. Ghramm using your personal funds, and then check the box for "Final" report.

Please file the amended C-4 report as listed above, and provide a written response to the questions listed above, along with the requested documents and any additional information you want to provide **by March 12, 2015**.

I am aware of your attempts to transmit your PDC electronically using the Online Reporting Campaign Activity (ORCA), so please continue working on electronically filing your campaign finance reports, and let me know once you have successfully transmitted your reports.

Thank you for your attention to this matter, and if you have any questions concerning staff's request, please contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail.

Sincerely,

  
Kurt Young  
PDC Compliance Officer

# EXHIBIT 5

## Phil Stutzman

---

**From:** Kurt Young  
**Sent:** Wednesday, March 18, 2015 9:21 AM  
**To:** Tony Perkins; Phil Stutzman  
**Subject:** FW: PDC Case No. 15-045

FYI

---

**From:** Gina Tveit [mailto:ginatveit@hotmail.com]  
**Sent:** Tuesday, March 17, 2015 4:14 PM  
**To:** Kurt Young  
**Subject:** RE: PDC Case No. 15-045

Dear Mr. Young,

Below are my responses to the questions that were set forth in your email dated February 23, 2015:

1. My intention was to file my final PDC reports electronically. When I experienced difficulty with this due to an outdated operating system on my personal pc, I filed my final reports on paper and submitted those on February 2, 2015. It was never my intention not to file the reports.
2. Yes, all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed. The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed.
3. The figure of \$24,790.75 was based on campaign expenses incurred, reported on schedule A to C4.
4. The advertisement expenses from Mr. Hanley were for three (3) direct mail postcards sent out starting on the day the general ballots were mailed out to the voters. Stevens County is vote by mail only. I will send you a copy of the invoices.
5. The phone poll was an ID autopoll. The purpose of the poll was to measure name recognition and favorable vs. unfavorable opinion as to my opponent and myself. The poll was sent to the most likely Stevens County voters with landlines. The cost of the poll was \$1250.00. I will send a copy of the script and invoice from the poll.

It might be helpful for your to understand a little bit of the background to 2014 my campaign. I was elected in 2010 to my current position and spent approximately \$10,000 on my campaign. In 2014, my opponent, Michael Clay, ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negativity, which included negative weekly newspaper advertng and negative direct mailings. That is why I consulted with John Hanley of Red Maverick Media. The phone poll was designed to measure name recognition and to try to determine what effect my opponent's constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out. My opponent and I were not on the primary ballot. I never intended to not report my campaign expenses, but I was delayed due to the difficulty I had doing so electronically. In 2010, I was not required to file my reports electronically and I had no understanding of what that would entail.

In addition, I would like you to know that my campaign remained positive throughout. Even though I had very damaging information on my opponent from the results of the private investigator's report, I never used this information in my campaign. Even though I was well aware of my opponent's reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a coy of the report, I immediately forwarded it the WSBA. I felt I had a judicial responsibility to do so but I did not request to be involved as the complainant. As such, I do not receive updates from the bar and I do not know the status of the bar investigation. As far as I a concerned, the information is where it should be and I will let the bar association proceed however they see fit.

Please feel to contact me to discuss this matter further. Once I have provided the information you have requested, it is my intention to proceed with re-filing my reports electronically.

Sincerely,

Gina A. Tveit  
509-680-1206

---

**From:** Kurt Young [<mailto:kurt.young@pdc.wa.gov>]  
**Sent:** Monday, February 23, 2015 6:46 PM  
**To:** [ginatveit@hotmail.com](mailto:ginatveit@hotmail.com)  
**Subject:** PDC Case No. 15-045

Judge Tveit,

I am the PDC staff member that was assigned to investigate the complaint filed against you by Michael Clay in PDC Case No. 15-045.

I am following-up on the information you disclosed on the C-3 and C-4 report you filed with the PDC, the allegations listed in the complaint filed by Mr. Clay, and your prior correspondence with PDC staff member Tony Perkins concerning the receipt of over-limit in-kind contributions from Gary Ghramm. In order to assist my investigation, I have attached a letter concerning PDC staff's request that you: (1) amend the C-4 report filed on February 2, 2015 and provide the corrected information as outlined in the letter; (2) provide a written response to the questions listed in the letter; and (3) provide the requested documents and any additional information you want to supplement your response.

Please review the letter and let me know if you have any questions. I will contact you tomorrow at (509) 680-1206 and leave you a message concerning the email, unless I hear from you sooner.

Sincerely,

Kurt Young  
PDC Compliance Officer  
(360) 664-8854 Direct Line

Here is the sample survey script we are working on for your Stevens County Judge...

**Prompt 1:**

Good evening, you have been randomly selected for a short five question issue survey in your area. Thank you for participating.

First, in the upcoming November General Election, how likely are you to vote?

- Press 1 for Definitely voting
- Press 2 for Probably voting
- Press 3 for Probably NOT voting
- Press 4 for Definitely NOT voting

#

**Prompt 2:**

Thinking of public figures in your county, do you have a favorable opinion, unfavorable opinion, no opinion, or have you never heard of Michael Clay?

- Press 1 for Favorable Opinion
- Press 2 for Unfavorable Opinion
- Press 3 for Heard of, but No Opinion
- Press 4 for Never heard of

#

**Prompt 3:**

Do you have a favorable opinion, unfavorable opinion, no opinion, or have you never heard of Gina Tveit (Ta-WHITE)?

- Press 1 for Favorable Opinion
- Press 2 for Unfavorable Opinion
- Press 3 for Heard of, but No Opinion
- Press 4 for Never heard of

#

**Prompt 4:**

If the November Election for Stevens County District Court Judge were being held today, would you vote for Michael Clay or Gina Tveit (Ta-WHITE)?

- Press 1 for Michael Clay
- Press 2 for Gina Tveit
- Press 3 for Undecided

#

**Prompt 5:**

And finally are you male or female?

- Press 1 for male
- Press 2 for female

#

Thank you. Good Night.





**Invoice**

Red Maverick Media LLC  
 403 N. Second Street, FL2  
 Harrisburg, PA 17101

Gina Tveit  
 669 Pend Oreille Way  
 Colville, WA 99114

Date	Rep	Job Code
10/8/2014	JH	14-TVE-001

Qty	Description	Amount
9,045	Tveit Direct Mail Production 001	3,990.00
9,045	Tveit Advance Postage for 001	2,472.00

REVISED!!!! We advanced your postage for you.

Sales Tax (0.0%)	\$0.00
<b>Total</b>	<b>\$6,462.00</b>



**Invoice**

Red Maverick Media LLC  
403 N. Second Street, FL2  
Harrisburg, PA 17101

Gina Tveit  
669 Pend Oreille Way  
Colville, WA 99114

Date	Rep	Job Code
10/8/2014	JH	14-TVE-002

Qty	Description	Amount
9,045	Tveit Direct Mail Production 002	3,990.00
9,045	Advanced Postage for Tveit 002	2,472.00

REVISED!!! We advanced postage for you!

Sales Tax (0.0%) \$0.00

**Total \$6,462.00**



**Invoice**

Red Maverick Media LLC  
403 N. Second Street, FL2  
Harrisburg, PA 17101

Gina Tveit  
669 Pend Oreille Way  
Colville, WA 99114

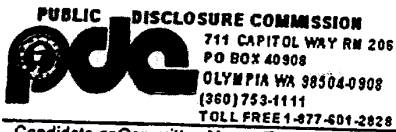
Date	Rep	Job Code
10/8/2014	JH	14-TVE-003

Qty	Description	Amount
9,045	Tveit Direct Mail Production 003	3,990.00
9,045	Advanced postage for 003	2,472.00

Sales Tax (0.0%) \$0.00

**Total \$6,462.00**

# EXHIBIT 6



**CAMPAIGN SUMMARY  
RECEIPTS & EXPENDITURES**

**C4**  
(1/12)

DATE FILED PDC  
FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Include full name)  
Gina A. Treit

Mailing Address  
669 Pend Oreille Loop Colville City

Zip +4  
99114

Office Sought (Candidates)  
District Court Judge

Election Date  
11-4-14

Report Period Covered  
10-14-14 12-10-14

Final Report? Yes  No

\*For PACs, Parties & Caucus Committees: During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate?  
Yes  No

**RECEIPTS**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	<u>\$17,388.55</u>
2. Cash received (From line 2, Schedule A) .....	<u>\$24,790.75</u>
3. In-kind contributions received (From line 1, Schedule B) .....	<u>4,500.00</u>
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....	<u>29,290.75</u>
5. Loan principal repayments made (From line 2, Schedule L) .....	<u>( )</u>
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-) _____
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-) _____
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....	<u>46,679.30</u>
9. Total pledge payments due (From line 2, Schedule B) .....	<u>( )</u>

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	<u>17,388.55</u>
11. Total cash expenditures (From line 4, Schedule A) .....	<u>24,790.75</u>
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	<u>4,500.00</u>
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....	<u>24,790.75</u>
14. Loan principal repayments made (From line 2, Schedule L) .....	<u>( )</u>
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-) _____
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-) _____
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....	<u>46,790.30</u>

<p><b>CANDIDATES ONLY</b></p> <table border="0"> <tr> <td></td> <td>Won</td> <td>Lost</td> <td>Unopposed</td> <td>Name not on ballot</td> </tr> <tr> <td>Primary election</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>General election</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table> <p>Treasurer's Daytime Telephone No.: <u>509 680-1206</u></p>		Won	Lost	Unopposed	Name not on ballot	Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	General election	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><b>CASH SUMMARY</b></p> <p>18. Cash on hand (Line 8 minus line 17) .....</p> <p>[Line 18 should equal your bank account balance (s) plus your petty cash balance]</p> <p>19. Liabilities: (Sum of loans and debts owed) .....</p> <p>20. Balance (Surplus or deficit) (Line 18 minus line 19) .....</p>
	Won	Lost	Unopposed	Name not on ballot												
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
General election	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>												

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature: Gina A. Treit Date: 1-29-15

Treasurer's Signature: Gina A. Treit Date: 1-29-15

SEE INSTRUCTIONS ON REVERSE

DATE FILED PDC

**CASH RECEIPTS AND EXPENDITURE**

**SCHEDULE A**  
to C4 (104)

FEB -2 2015

Candidate or Committee Name (Do not abbreviate Use full name)

Gino A. Treit

Report Date

12-10-14

1. CASH RECEIPTS (Contributions) which have been reported on C3 List each deposit made since last C4 report was submitted

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
10-1-14	\$24,790.75					\$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$

CODES FOR CLASSIFYING EXPENDITURES If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

- C - Contributions (monetary, in-kind & transfers)
- I - Independent Expenditures
- L - Literature, Brochures, Printing
- B - Broadcast Advertising (Radio, TV)
- N - Newspaper and Periodical Advertising
- O - Other Advertising (yard signs, buttons, etc)
- V - Voter Signature Gathering

- P - Postage, Mailing Permits
- S - Surveys and Polls
- F - Fundraising Event Expenses
- T - Travel, Accommodations, Meals
- M - Management/Consulting Services
- W - Wages, Salaries, Benefits
- G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
10-1-14	Loon Lake Times	N	Ad	\$ 56
10-3-14	Statesman Examiner	N	Ad	329.50
10-9-14	Statesman Examiner	N	Ad	407.55
10-10-14	Silverado Express	N	Ad	1175.00
10-16-14	Statesman Examiner	N	Ad	407.55
10-22-14	Statesman Examiner	N	Ad	407.55
11-1-14	John Hanley	I/S	Ad/Phone Poll	20,636

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 1,371.60  
Enter also on line 11 of C4 \$ 24,790.75

CODE DEFINITIONS ON NEXT PAGE

DATE FILED PDC

CASH RECEIPTS AND EXPENDITURE

SCHEDULE A  
to C4 (1.04)

FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Use full name.)

Gina A. Tveit

Report Date

12-10-14

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
						\$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
11-1-14	The Independent	N	Ad	\$ 1371.60

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 23,419.15  
Enter also on line 11 of C4 \$ 24,790.75

CODE DEFINITIONS ON NEXT PAGE

DATE FILED PDC

**IN KIND CONTRIBUTIONS, PLEDGES,  
ORDERS, DEBTS, OBLIGATIONS**

SCHEDULE  
TO C4

**B**

FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Use full name.)

*Gina A. Tveit*

Report Date

*12-10-14*

**1. IN KIND CONTRIBUTIONS RECEIVED** (goods, services, discounts, etc.)

Date Received	Contributor's Name and Address	Description of Contribution*	Fair Market Value	Aggregate Total	P R I	G E N	If more than \$100, Employer Name, City, State & Occup.
<i>5-12-14</i>	<i>Gary Ghramm Kellog, ID</i>	<i>Services</i>	<i>\$4500</i>	<i>\$4500</i>			<i>Retired</i>
							Occupation
							Occupation
							Occupation
<input type="checkbox"/> Check here if additional pages are attached.			TOTAL (Enter also on line 3 and line 12 of C4)		<i>4500</i>		

**2. PLEDGES RECEIVED BUT NOT YET PAID.** List each pledge of \$100.00 or more.

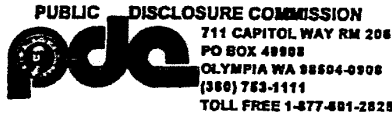
Date Notified of Pledge	Name and Address of Pledge Maker	Fair Market Value	Aggregate Total	P R I	G E N	If more than \$100, Employer Name, City, State & Occup.	
						Occupation	
						Occupation	
<input type="checkbox"/> Check here if additional pages are attached.			TOTAL (include new pledges above and all other outstanding pledges.) (Enter also on line 9 of C4)		\$		

**3. ORDERS PLACED, DEBTS, OBLIGATIONS.** If debt is owed to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown of expenses included in the debt. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation*
<i>1-29-15</i>	<i>Gary Ghramm</i>	<i>\$2600</i>	<i>C</i>	<i>Reimbursement</i>
		\$		
		\$		
		\$		
		\$		
		\$		
<input type="checkbox"/> Check here if additional pages are attached.		TOTAL (Include in line 19 of C4)		
		<i>\$2600</i>		

\*SEE NOTE AND CODE DEFINITIONS ON REVERSE





**CASH RECEIPTS  
MONETARY  
CONTRIBUTIONS**

**C3**  
(1/12)

THIS SPACE FOR OFFICE USE  
**DATE FILED PDC**  
FEB -2 2015

Candidate or Committee Name (Do not abbreviate. Use full name.)  
Gina A. Treit

Mailing Address  
1669 Pend Oreille Loop

City Colville Zip + 4 99114 Office Sought (candidates) Dist-Court Judge Election Date 11-4-14

**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received	Amount	Total
	a. Anonymous	\$
<u>10-1-14</u>	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)	<u>24,790.75</u>
	c. Loans, notes, security agreements. Attach Schedule L	
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation	
	e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
					\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Occupation			\$	\$
		Sub-total			<u>24,790.75</u>	<u>*See reverse for details.</u>

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

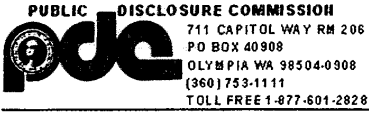
4. Date of Deposit 10-1-14

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature Gina A. Treit Date 1-29-15

Treasurer's Daytime Telephone No.: (509) 680-1206

# EXHIBIT 7



**CAMPAIGN SUMMARY  
RECEIPTS & EXPENDITURES**

**C4**  
(1/12)

PDC OFFICE USE  
**DATE FILED PDC**  
AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Include full name)  
Gina A. Tveit

Mailing Address  
669 Pend Oreille Loop City Colville

Zip +4 99114 Office Sought (Candidates) District Court Judge Election Date 11-4-14

Report Period Covered 6-10-14 To (end of period) 8-10-14 Final Report? Yes  No

\*For PACs, Parties & Caucus Committees: During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate)? Yes  No

**RECEIPTS**

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... \$ 5000.00
2. Cash received (From line 2, Schedule A) ..... \$ 1322.42
3. In kind contributions received (From line 1, Schedule B) .....
4. Total cash and in kind contributions received this period (Line 2 plus 3) ..... 1322.42
5. Loan principal repayments made (From line 2, Schedule L) .....
6. Corrections (From line 1 or 3, Schedule C) ..... Show + or (-) .....
7. Net adjustments this period (Combine line 5 & 6) ..... Show + or (-) .....
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) ..... 6000 + 6322.42
9. Total pledge payments due (From line 2, Schedule B) ..... = 12,322.42

**EXPENDITURES**

10. Previous total cash and in kind expenditures (From line 17, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) ..... 4862.44
11. Total cash expenditures (From line 4, Schedule A) ..... 7210.27
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) ..... 7210.27
14. Loan principal repayments made (From line 2, Schedule L) .....
15. Corrections (From line 2 or 3, Schedule C) ..... Show + or (-) .....
16. Net adjustments this period (Combine lines 14 & 15) ..... Show + or (-) .....
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) ..... 12,072.71

**CANDIDATES ONLY**

	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Treasurer's Daytime Telephone No.:  
509 680-1206

**CASH SUMMARY**

18. Cash on hand (Line 8 minus line 17) ..... 249.71  
(Line 18 should equal your bank account balance(s) plus your petty cash balance.)

19. Liabilities: (Sum of loans and debts owed) ..... ( )

20. Balance (Surplus or deficit) (Line 18 minus line 19) .....

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature Gina A. Tveit Date 8-10-14 Treasurer's Signature Gina A. Tveit Date 8-10-14

SEE INSTRUCTIONS ON REVERSE

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**  
to C4  
(1.04)

8-10-14  
READY FILED PDC  
AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Use full name.)

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount

Total deposits \$

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 1322.42

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

- C - Contributions (monetary, in-kind & transfers)
- I - Independent Expenditures
- L - Literature, Brochures, Printing
- B - Broadcast Advertising (Radio, TV)
- N - Newspaper and Periodical Advertising
- O - Other Advertising (yard signs, buttons, etc.)
- V - Voter Signature Gathering

- P - Postage, Mailing Permits
- S - Surveys and Polls
- F - Fundraising Event Expenses
- T - Travel, Accommodations, Meals
- M - Management/Consulting Services
- W - Wages, Salaries, Benefits
- G - General Operation and Overhead

3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	140.00
6-19-14	Stick-it Signs	O	Signs	\$1657.04
6-30-14	Stick-it Signs	O	Signs	2078.13
7-11-14	Grandma Deenies	O	Candy	100.00
6-24-14	Campaign Pros 5200 SW 30th St. Davenport, IA 52802	O	Pens/Not pads	871.94
7-4-14	Go Daddy.com	O	webhosting/ domain registration	122.42

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 2240.74  
Enter also on line 11 of C4 \$ 7210.27

CODE DEFINITIONS ON NEXT PAGE

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE **A**  
to C4  
(1.04)

8-10-14  
Report Date

Candidate or Committee Name (Do not abbreviate. Use full name.)

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

DATE FILED PDC

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount

Total deposits  
\$ AUG 11 2014

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 1322.42

CODES FOR CLASSIFYING EXPENDITURE: If one of the following codes is used to describe an expenditure, no other description is generally needed.

The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information in the Description block: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE	C - Contributions (monetary, in-kind & transfers) I - Independent Expenditures L - Literature, Brochures, Printing B - Broadcast Advertising (Radio, TV) N - Newspaper and Periodical Advertising O - Other Advertising (yard signs, buttons, etc.) V - Voter Signature Gathering	P - Postage, Mailing Permits S - Surveys and Polls F - Fundraising Event Expenses T - Travel, Accommodations, Meals M - Management/Consulting Services W - Wages, Salaries, Benefits G - General Operation and Overhead
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3. EXPENDITURES

- Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below.
- Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- For each payment to a candidate, campaign worker, PR firm, advertising agency, consultant or credit card company, provide a detailed breakdown in the Description block of expenses included in the payment.

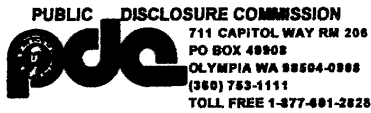
Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	
6-23-14	Colville Printing P.O. Box 88, Colville, WA	L	Brochures	\$ 543.38
7-2-14	The Independant P.O. Box 5 Chewelah, WA BGR	N	Ad	183.60
6-15-14	1150 S. Main Colville, WA 99114	O	Posts, supplies	207.61
7-23-14	Colville Printing	L	Brochures	114.33
6-9-14	UPS store 1250 N. Hwy Colville, WA 99114	O	Mailbox	95.38
6-11-14	Stick-It Signs	O	Signs	1031.88
6-17-14	Stick-It Signs 672 S. Main Colville, WA 99114	O	Signs	64.56

Total from attached pages \$ 4969.53

4. TOTAL CASH EXPENDITURES

Enter also on line 11 of C4 \$ 7210.27

CODE DEFINITIONS ON NEXT PAGE



**CASH RECEIPTS  
MONETARY  
CONTRIBUTIONS**

**C3**  
(1/12)

THIS SPACE FOR OFFICE USE

DATE FILED PDC

AUG 11 2014

Candidate or Committee Name (Do not abbreviate. Use full name.)  
*Gina A. Tveit*

Mailing Address  
*669 Pend Oreille Loop*

City *Colville, WA* Zip *99114* Office Sought (candidates) *D.G. Judge* Election Date *11-4-14*

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous .....	\$	\$
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	<i>6000.00</i>	<i>6000.00</i>
c. Loans, notes, security agreements. Attach Schedule L .....		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
e. Small contributions \$25.00 or less not itemized and number of persons giving (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
<i>7-4-14</i>	<i>Stephen Graham 1312 N. Monroe Spokane, WA 99114</i>	<i>self</i> <i>Occupation attorney</i>			<i>\$ 122.42</i>	
<i>7-10-14</i>	<i>Whitty's Southtown 841 S. Main Colville, WA 99114</i>				<i>\$ 50.00</i>	
<i>7-20-14</i>	<i>John W. Goldsmith P.O. Box 152 Colville, WA 99114</i>	<i>Occupation retired</i>			<i>\$ 250.00</i>	
<i>8-1-14</i>	<i>Betty Koller 372 Bastien Lane Colville, WA 99114</i>	<i>Occupation retired</i>			<i>\$ 400.00</i>	
<i>8-2-14</i>	<i>James Harvie 3353 Highway 25 S. Gifford, WA 99131</i>	<i>Occupation retired</i>			<i>\$ 500.00</i>	
	<input type="checkbox"/> Check here if additional pages are attached				<b>Sub-total</b> <i>1322.42</i>	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

*7322.42*

\*See reverse for details.

4. Date of Deposit

*8-8-14*

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Treasurer's Daytime Telephone No.:

*(509) 680-1206*

*Gina A. Tveit*

*8-10-14*

# EXHIBIT 8



## PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111  
Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

November 6, 2014

JUDGEGINATVEIT@GMAIL.COM

GINA TVEIT  
669 PEND OREILLE LOOP  
COLVILLE WA 99114

**Subject: Warning Letter for Missing Electronic PDC Reports**

Dear GINA TVEIT :

**YOUR REQUIRED ELECTRONIC PDC REPORTS FOR 2014 ARE PAST DUE.** Our records indicate that you are registered with the Public Disclosure Commission (PDC) as a candidate, that you incurred expenditures totaling more than \$5,000 on or before November 6, 2014, and that you have not begun to file your C-3 and C-4 reports electronically, as required by law, RCW 42.17A.245 and WAC 390-19-030. Your campaign must be brought into compliance with the electronic filing requirement by the next C-4 due date of December 10, 2014. Failure to do so may result in enforcement action. As of today the PDC has not received your electronic financial disclosure reports. The required reports must be filed electronically even if you lost the election.

**TO AVOID ENFORCEMENT ACTION AND A POSSIBLE MONETARY PENALTY, you must electronically file the missing reports by Wednesday, December 10, 2014.** This is the only formal warning notice you will receive regarding this matter. If the missing reports are not received by **December 10**, we may schedule a hearing that could result in a monetary penalty.

**PDC CANNOT ACCEPT FAXED, SCANNED, OR EMAILED REPORTS.**

If you have questions about filing the missing reports please refer to the enclosed pamphlet or contact us for assistance at one of the numbers listed below. Thank you for your prompt attention to this matter.

PDC Staff

**For PDC Filer Assistance:**

- (360) 753-1111
- Toll Free 1-877-601-2828
- E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)



# EXHIBIT 9

## Tony Perkins

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**From:** Gina Tveit [ginatveit@hotmail.com]  
**Sent:** Friday, June 20, 2014 2:02 PM  
**To:** Tony Perkins  
**Subject:** RE: Gina A. Tveit Response to T14-104

Dear Mr. Perkins,

Here is my response:

1. Yes I assumed it was for Stevens County District Court.
2. My father sponsored Mr. Pulver's investigation and it was his decision to do so.
3. I believe sometime in January 2014.
4. I doubt it.
5. Not that I am aware of. I have not.

Is it important that the information developed from the investigation has not been used by my campaign? The investigation report was immediately turned over to the Washington State Bar Association according to my obligations under the Judicial Rules of Conduct. Ethical investigations are confidential and since I am not a grievant in the complaint, I am not kept informed of the status of the matter.

If I were to publically disclose the expense at this time, what would happen next?

I did call and leave a voice mail message to discuss this matter with you, and these are the general questions that I have.

Thank you,

Gina A. Tveit  
509-680-1206

---

**From:** Tony Perkins [mailto:tony.perkins@pdc.wa.gov]  
**Sent:** Thursday, June 12, 2014 5:13 PM  
**To:** ginatveit@hotmail.com  
**Cc:** Phil Stutzman; Jacob Berkey  
**Subject:** RE: Gina A. Tveit Response to T14-104

Dear Judge Tveit,

This email is a follow-up to my voice message left for you a moment ago. I understand that you are preparing to supplement your initial preliminary response (below) to the complaint filed against you by Michael Clay, PDC tracking number T14-104. In supplementing your initial response, please ensure that you address the following questions:

1. You stated in your response that you are unaware that Michael Clay has returned to Stevens County from Western Washington. However, when you heard rumors in the winter of 2013 that Mr. Clay was considering running for district court judge, did you understand that he was considering a run in Stevens County District Court?
2. Who sponsored the investigative services of Ted Pulver? If your father or some other person sponsored Mr. Pulver's services, was the expense incurred in consultation with you?

3. On what date were Mr. Pulver's services engaged?
4. Would you or your father have sponsored Mr. Pulver's investigative services had Michael Clay not been a candidate for Stevens County District Court Judge? Please explain why, or why not.
5. Has your father incurred expenses for similar investigative services in other circumstances? Have you? Please provide examples.

If you have questions about what is required of you during the PDC's review of this complaint, please contact me at the number below. Because I am scheduled out of the office tomorrow, Friday June 13, 2014, please contact PDC Director of Compliance Phil Stutzman at (360) 664-8853 if you require assistance during that time. I will be in the office again on Monday and available to take your call.

Thank you for your attention to this. Once we have received and reviewed your full preliminary response to Mr. Clay's complaint, PDC staff will complete our review as quickly as possible, and let you know whether we will conduct a formal investigation of the complaint.

Sincerely,

## Tony Perkins

Lead Political Finance Specialist  
Washington State Public Disclosure Commission

☎ (360) 586-1042

☎ (360) 753-1112

✉ [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov)

---

**From:** gina tveit [<mailto:ginatveit@hotmail.com>]

**Sent:** Thursday, May 29, 2014 10:13 PM

**To:** PDC

**Subject:**

May 29, 2014

Public Disclosure Commission

711 Capitol Way Room 206

P.O. Box 40908

Olympia, WA 998504-0908

Re: T14-104

Dear Mr. Stutzman,

Please be advised that I filed a Declaration of Candidacy with the Stevens County Auditor for the position of District Court Judge on May 12, 2014. I subsequently submitted my Candidate Registration for filing with the PDC on May 21, 2014.

I will first respond to the allegation that I obtained public records from Superior Court files without paying for them. In the afternoon of Friday December 6, 2013, I went to the Superior Court Clerk's office. I stood in line at the public window. There was someone in front of me being assisted and I waited my turn. I then handed the deputy clerk, Jenna Bourgeau, a piece of paper containing 5 case numbers and said I wished to check out these files and take them home for the weekend. For the past 25 years that I have worked in the legal field, this is common practice and procedure for members of the legal community. The clerk stated that she could just "email" the files rather than pulling them and physically giving them to me. I told her that I was not familiar with that process and I wasn't even sure

which documents I would want to look at from each file. She stated that she would simply email the entire file. I made it very clear that this was a personal request and not work related. If she wanted to email the files to me she would have to send them to my personal email account and not my county email account. I wrote my personal email account down on the same piece of paper that I had given to her with the case file numbers. I further told the clerk that I would not be able to retrieve the email until after I got home. AT NO TIME DID THE DEPUTY CLERK INFORM ME THAT THERE WAS A FEE DUE FOR MY REQUEST. In fact, if she had simply pulled the files as I had requested, there would be no fee incurred. AT NO TIME UP TO AND INCLUDING THE PRESENT DATE AND TIME, HAS ANYONE FROM THE CLERK'S OFFICE REQUESTED THAT I PAY A FEE. After receiving this complaint, I did contact the elected Superior Court Clerk, Patricia Chester. She indicated that she did receive a phone call from Mike Clay asking whether or not I had checked out files and paid a fee. After checking with her staff, she confirmed to Clay that I had checked out files and had not paid a fee. Ms. Chester indicated to me that she did not think I had done anything improper and she would write a statement to that effect. I also stated to her that if a fee was owed I certainly would pay it. Ms. Chester told me that she would get back to me with her statement and let me know what amount, if any, was owed. As to whether or not someone from the clerk's office advised Clay that I had obtained these files, Ms. Chester was unaware of that. There wouldn't seem to be any legitimate reason for that to occur. The files that I requested were the files that are listed on the *Inside Courts* public website under Clay's name. The files are three of his divorce files and two criminal files. I am attaching copies of the email(s) I received from the deputy clerk with the attached files sent to my personal Hotmail account.

Secondly, I will respond to the allegation regarding the private investigator. Sometime in the winter of 2013, my father and I discussed the rumor that Mike Clay was considering running for District Court Judge. For years there has been widespread gossip in the community regarding Mike Clay's inappropriate relationships with women involved in the court cases he was handling, either as a deputy prosecutor or a contracted public defender. My father expressed to me great concern regarding these allegations and he contacted Ted Pulver for the purpose of either confirming or denying these rumors. The fact is, Mr. Pulver's investigation revealed very serious allegations of professional misconduct, perhaps even criminal conduct. When the report was completed in April 2014, I felt that I had an obligation under the Judicial Code of Conduct to forward the report to the Bar Association, which I did do. As far as I'm concerned, the report is in the appropriate hands and that is where the matter needs to remain. I have no intentions of using the information contained in the report during my campaign. I can truly say that I had never considered this a campaign expenditure, which commonly would include expenses for such items as campaign signs, advertising, brochures, etc.

I am also attaching copies of three (3) letters received from Mike Clay indicating that as of April 2013 he had moved to Western Washington. I have never received any information indicating that he had actually returned to Stevens County and I honestly don't even know when that occurred.

In conclusion, I have always had every intention of being in compliance with the PDC requirements. I would like the opportunity to do some additional research and to talk with PDC staff with my questions. I am asking for one additional week.

Thank you for your consideration.

Sincerely,

Gina A. Tveit

# EXHIBIT 10



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111 • FAX (360) 753-1112  
Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH RCW 42.17A

PDC Case No. 15-045

Gina Tveit

Respondent.

Report of Investigation

**I.**

**Background**

- 1.1 On March 18, 2010, Gina Tveit filed a Personal Financial Affairs Statement (F-1 report) disclosing she had recently been appointed to the position of Stevens County District Court Judge.
- 1.2 On March 18, 2010, Ms. Tveit also filed a Candidate Registration (C-1 report) registering her candidacy for Stevens County District Court Judge in 2010. Ms. Tveit initially selected the Mini Reporting Option, but on May 7, 2010, amended her registration to the Full Reporting Option.
- 1.3 Ms. Tveit was elected Stevens County District Court Judge in the November 2, 2010 general election.
- 1.4 On February 11, 2014, Michael Clay filed a C-1 report registering his candidacy for Stevens County District Court Judge in 2014. Mr. Clay was a first-time candidate for public office, and selected the Full Reporting option.
- 1.5 On May 8, 2014, Mr. Clay filed a complaint with the Public Disclosure Commission (PDC) alleging that Ms. Tveit may have violated RCW 42.17A.205, .235, and .240 by failing to timely register and report as a candidate for Stevens County District Court Judge in 2014. (**Exhibit 1**)
- 1.6 On May 24, 2014, Ms. Tveit filed a C-1 report registering her candidacy for Stevens County District Court Judge in 2014. She selected the Full Reporting Option, which requires candidates to file frequent reports of contributions and expenditures. (**Exhibit 2**)
- 1.7 Ms. Tveit was elected Stevens County District Court Judge in the November 4, 2014 general election.

**II.**  
**Allegations & Summary of Investigative Findings**

- 2.1 The Complaint alleged that Ms. Tveit failed to timely register as a candidate in February 2014, after Ms. Tveit became aware that Mr. Clay was seriously considering challenging her in the November 2014 general election, and then expended funds for a private investigator to investigate Mr. Clay. Although not alleged directly by the complainant, the Complainant implied that by not registering, Ms. Tveit also failed to report the cost of hiring the private investigator.
- 2.2 PDC staff investigated the timeliness of Ms. Tveit's registration as a 2014 candidate for Stevens County District Court Judge, as well as the timeliness of reporting the initial in-kind contribution received by Ms. Tveit's campaign (Campaign), which was the cost of hiring a private investigator, paid for by Ms. Tveit's father, Gary Ghramm. In addition, staff investigated whether Ms. Tveit accepted an over-limit in-kind contribution from her father for this expenditure. (RCW 42.17A.205, .235, .240 and .405.)
- 2.3 PDC staff also investigated the timeliness of other contributions and expenditures reported by the Campaign, and whether the Campaign filed its reports using the electronic method, as required. (RCW 42.17A.235, .240, and .245)
- 2.4 PDC staff opened a formal investigation on January 15, 2015. A summary of staff's findings is noted below.
- 2.5 Mr. Ghramm engaged the services of Ted Pulver, a private investigator, to investigate Mr. Clay, sometime in January 2014. Ms. Tveit acknowledged that her father would not have engaged Mr. Pulver's services, except for the fact that Mr. Clay was a potential candidate for Stevens County District Court Judge. Shortly after Mr. Ghramm engaged the services of Mr. Pulver, Mr. Clay filed his candidate registration.
- 2.6 Ms. Tveit was aware of her father's activities, and was therefore required to file a C-1, registering her candidacy, within two weeks of the date she was informed of his activities, or by no later than February 13, 2014. She filed a candidate registration 100 days late on May 24, 2014.
- 2.7 The value of Mr. Ghramm's in-kind contribution was \$4,500. Because the contribution limit to Ms. Tveit's campaign was \$1,900 per election, Ms. Tveit accepted an over-limit in-kind contribution in the amount of \$2,600.
- 2.8 The Campaign received monetary and in-kind contributions totaling \$46,679, with an equal amount of expenditures. Of this amount, Ms. Tveit contributed \$40,207 in personal funds which represented 86.5 percent of all contributions received.
- 2.9 The Campaign failed to timely file a C-3 report disclosing the receipt of \$24,791 in personal funds from Ms. Tveit on October 1, 2014. The Campaign was required to file a C-3 report disclosing receipt of this contribution by October 6, 2014, but did not report receipt of the contribution until February 2, 2015, 119 days late and nearly three months

after the 2014 general election. The late-reported contribution represented 53.1 percent of all contributions received by the Campaign.

2.10 The Campaign failed to file its 7-day Pre-General election C-4 report, which was due by October 28, 2014, and its Post-General election C-4 report, which was due by December 10, 2014, until February 2, 2015. The report covered the period October 14 through December 10, 2014, and disclosed previously unreported activities undertaken by the Campaign prior to the election. The 7-day C-4 report was filed 97 days late, and the Post-General election C-4 report was filed 54 days late. The late reported activities included:

- 1) \$24,791 monetary contribution from Ms. Tveit's personal funds;
- 2) \$24,791 in campaign expenditures for political advertising that included direct mail pieces, newspaper advertisements, and an ad/telephone poll. These expenditures were reported 97 days late;
- 3) \$4,500 in-kind contribution received from Mr. Ghramm, Ms. Tveit's father, for the cost of hiring a private investigator to investigate Mr. Clay. This contribution was reported at least 265 days late; and
- 4) \$2,600 in outstanding debts or obligations owed to Mr. Ghramm to repay the over-limit portion of his in-kind contribution.

2.11 The Campaign filed its C-3 and C-4 reports manually, on paper, rather than by the required electronic method. The Campaign did not request an exemption from the electronic filing requirement, and therefore failed to report electronically.

### **III.** **Findings**

3.1 Candidates registered under the Full Reporting option for the 2014 election were required to file weekly C-3 reports beginning June 1, 2014, and C-4 reports on the following intervals:

- Monthly C-4 reports by the 10<sup>th</sup> of each month disclosing contribution and expenditure activities incurred in the previous calendar month, if more than \$200, provided no special reports were due during that month;
- A 21-day pre-primary election C-4 report due on July 15, 2014, covering the period June 1 through July 14, 2014;
- A 7-day pre-primary election C-4 report due on July 29, 2014, covering the period July 15 through July 28, 2014; and
- A post-primary election C-4 report by September 10, 2014, covering the period July 29 through August 31, 2014.



- A 21-day pre-general election C-4 report due on October 14, 2014, covering the period September 1 through October 13, 2014;
- A 7-day pre-general election C-4 report due on October 28, 2014, covering the period October 14 through October 27, 2014; and
- A post-general election C-4 report due on December 10, 2014, covering the period October 28 through November 30, 2014.

3.2 Staff reviewed the C-3 and C-4 reports filed by Gina A. Tveit during the 2014 election cycle. Ms. Tveit submitted the following emailed responses and documents to PDC staff concerning Mr. Clay's allegations and staff's questions, which were also reviewed:

- May 29, 2014, email transmitted by Ms. Tveit to PDC staff concerning her declaration of candidacy, the filing of her C-1 report, and Mr. Clay's allegations that she: (1) obtained public court records of Mr. Clay from the Court Clerk that included his three divorces and two other files, without having to pay for them and thus receiving preferential treatment; and (2) failed to timely register and report as a candidate for the 2014 election, when she received an in-kind contribution for investigative services of Mr. Clay that were paid for by Ms. Tveit's father. **(Exhibit #3)**
- March 17, 2015, email transmitted by Ms. Tveit to PDC staff responding to staff's February 23, 2015, email requesting additional information from her in PDC Case No. 15-045. **(Exhibit #4)**
- March 18, 2015, email transmitted by Ms. Tveit to PDC staff in which she attaches a copy of the "sample survey script" and three invoices from Red Maverick Media for the direct mail pieces. **(Exhibit #5)**

3.3 Ms. Tveit stated that she was elected Stevens County Municipal Court Judge in 2010, and that she spent approximately \$10,000 on her campaign. She stated that her 2010 campaign did not meet the required thresholds to file PDC reports electronically using the Online Reporting of Campaign Activity (ORCA). She stated that it was her intention to file her PDC reports electronically for the 2014 election, but she had no understanding of what was required to file her reports electronically for the 2014 campaign.

3.4 Ms. Tveit stated that when she downloaded the ORCA software, she experienced a number of problems since her personal computer ran on an outdated operating system. She stated that to date, she has been unable to transmit any of her PDC reports electronically.

3.5 The Campaign filed its initial C-4 report on June 11, 2014, listing no beginning date for the C-4 report, that the report disclosed activities through June 10, 2014, and included a \$5,000 monetary contribution had been received from Ms. Tveit, and one expenditure totaling \$4,862 had been made to Stick-It Signs on May 22, 2014. The C-4 report was filed one day late.

- 3.6 The Campaign filed a combined June and July C-4 report on August 11, 2014, covering the reporting period of June 10 through August 10, 2014. The C-4 report disclosed that \$1,322 in monetary contributions was received by the campaign (+ \$6,000 on line 8), although no deposit information was listed, so it was not possible to ascertain when the monetary contributions had been received and deposited. The C-4 report disclosed the campaign made a number of expenditures totaling \$7,210 during the months of June and July, 2014.
- 3.7 The June 2014 portion of the activities reported on the C-4 report disclosed the Campaign made eight expenditures during the month of June totaling \$6,551. The June 2014 Campaign expenditures included; (1) Three expenditures to Stick-It Signs totaling \$4,767; (2) An \$872 expenditure to Campaign Pros for political advertisements in form of pens and notebooks; and (3) A \$543 expenditures to Colville Printing for campaign brochures. A June C-4 report was required to have been filed by the Campaign by July 10, 2014, and the June portion of campaign activities were disclosed 32 days late.
- 3.8 The Campaign filed an August on September 15, 2014, covering the reporting period August 10 through September 10, 2014, and disclosing \$3,300 in monetary contributions received, and that the campaign made six expenditures totaling \$2,607. An August C-4 report was required to have been filed by September 10, 2014. The August C-4 report was filed five days late.
- 3.9 The Campaign timely filed the 21-day Pre-General Election C-4 report on October 14, 2014, covering the reporting period of September 10 through October 13, 2014. The C-4 report disclosed the campaign received \$2,016 in new monetary contributions, and made \$2,709 in expenditures during the reporting period.

**Allegation No. 1: Failure to file C-3 and C-4 reports (RCW 42.17A.235 and .240)**

- 3.10 After timely filing the 21-day Pre-General election C-4 report on October 14, 2014, the Campaign stopped filing reports until after the November 5, 2014 general election, and after PDC staff had logged in the complaint filed by Mr. Clay. On February 2, 2015, Ms. Tveit filed a C-3 and C-4 report manually on paper as detailed below. **Exhibit #6.**

**C-3 report:**

- 3.11 The C-3 report disclosed Ms. Tveit contributed \$24,791 using her personal funds on October 1, 2014, and that those funds were deposited into the campaign bank account on October 1, 2014. Ms. Tveit was required to have filed a C-3 report not later than October 6, 2014 disclosing the contribution.
- 3.12 The C-3 report was filed 119 days late by Ms. Tveit and almost three months after the 2014 general election had been held. The \$24,791 monetary contribution made by Ms. Tveit in personal funds represented 53.1% of the total monetary and in-kind contributions received by the campaign for the entire 2014 election cycle.

**C-4 report:**

- 3.13 The Campaign failed to timely file a 7-day Pre-General election and Post-General election C-4 report.
- 3.14 On February 2, 2015, the Campaign filed one combined C-4 covering the period October 14 through December 10, 2014, and disclosing previously unreported activities that included: (1) the \$24,791 monetary contribution from Ms. Tveit; (2) \$24,791 in campaign expenditures for political advertisements; (3) a \$4,500 over-limit in-kind contribution from Ms. Tveit's father; and (4) a \$2,600 outstanding debt or obligation for the over-limit portion of the in-kind contribution.
- 3.15 The combined C-4 report disclosed a November 1, 2014, expenditure made by the Campaign to John Hanley totaling \$20,636 for the printing and postage of three direct mail pieces, and for the costs of an automated telephone poll, all reported after the November 4, 2014 general election. Staff requested and reviewed the invoices for the three direct mail pieces which listed Red Maverick Media was the vendor that printed and mailed the three direct mail pieces, for a total cost of \$19,386.
- 3.16 All three invoices from Red Maverick Media listed an orders-placed date of October 8, 2014, which required the Campaign to disclose the direct mail pieces as an outstanding obligation on the 21-day Pre-General election C-4 report. The 21-day Pre-General election C-4 report was due to be filed by the Campaign on October 14, 2014, and the \$19,386 portion of the \$20,636 expenditure made to Jon Hurley, was disclosed 111 days late.
- 3.17 The combined C-4 report also disclosed:
- The Campaign made expenditures to the Statesman Examiner totaling \$1,552 for four newspaper advertisements in October (run dates: 10/3; 10/9; 10/16; and 10/22), and one \$1,175 expenditure to Silverado Express on October 10, 2014, for a newspaper advertisement. The five expenditures was disclosed 111 days late.
  - A \$4,500 in-kind contribution was received by the Campaign from Gary Ghramm, Ms. Tveit's father, with the description listed as "Services." The in-kind contribution was reported as having been received by the Campaign on May 12, 2014. (NOTE - In section 3.22 of this Report of Investigation, Ms. Tveit acknowledged that Mr. Ghramm retained the services of a private investigator in January of 2014).
  - Based on that statement, an initial in-kind contribution should have been reported on a February 2014 C-4 report due by March 10, 2014. The in-kind contribution from Mr. Ghramm was disclosed 328 days late.
- 3.18 Ms. Tveit stated that she filed her C-3 and C-4 reports manually on paper, which she postmarked on February 2, 2015. Ms. Tveit stated that the failure to timely file the PDC reports was not intentional, and that the errors she encountered while attempting to file using the ORCA software contributed to the late reporting of the manual reports. She went on to state:

- That almost "...all of the money spent on my campaign came from my personal funds, other than the contributions I received which have been disclosed."
- "The monies were transferred from my personal account into my campaign account based on actual expenses incurred, which have been disclosed."
- She confirmed she deposited \$24,790.75 in personal funds into the campaign bank account on October 1, 2014, and that the amount deposited was based on campaign expenses she knew she was going to be incurring. She acknowledged that she failed to timely disclose the personal funds contributed by her on the C-3 report, and the corresponding expenditures she made using those funds on a C4 report.
- The expenditures made to Mr. Hanley by her Campaign were for three political advertisements in the form of direct mail postcards and a "telephone ID" automated poll. She stated that Stevens County is a vote-by-mail county, so she began mailing the postcards on the day the general election ballots were mailed out to registered voters by the Stevens County Auditor's Office.
- The telephone poll cost \$1,250 and was conducted with the purpose of measuring candidate name recognition, and favorable vs. unfavorable opinions of Ms. Tveit and Mr. Clay. She stated the short five questions telephone poll was conducted of "...most likely Stevens County voters with landlines."

**Allegation No. 2: Receiving an in-kind contribution that exceeded the \$1,800 per election contribution limits (RCW 42.17A.405)**

- 3.19 On May 8, 2014, PDC staff member Tony Perkins sent an email to Ms. Tveit informing her that PDC staff was in receipt of an inquiry alleging that her 2014 campaign for re-election had made campaign expenditures in support of her candidacy, but she had failed to file a C-1 report.
- 3.20 On May 10, 2014, Ms. Tveit responds to Mr. Perkins email stating she has not made any campaign expenditures in support of her 2014 campaign, but that once she filed her declaration of candidacy, she intended to comply with the PDC requirements and file her campaign reports.
- 3.21 On May 29, 2014, PDC staff receives Ms. Tveit's initial response to the complaint filed by Mr. Clay and responding to the allegation that she hired a private investigator to investigate him. **See Exhibit #3.** Ms. Tveit stated the following concerning the private investigator issue:

*"Sometime in the winter or 2013, my father and I discussed the rumor that Mike Clay was considering running for District Court Judge. For years there has been widespread gossip in the community regarding Mike Clay's inappropriate relationships with women involved in the court cases he was handling, either as a deputy prosecutor or a contracted public defender, perhaps even criminal conduct..."*

3.22 Ms. Tveit stated that her father had expressed to her his concerns regarding the Michael Clay allegations. She stated that he decided on his own to contact Ted Pulver, a private investigator in Idaho, in an attempt to confirm or deny the information about Mr. Clay that they had been hearing. She stated Mr. Pulver completed a report in April of 2014, and his "...*investigation revealed very serious allegations of professional misconduct...*"

3.23 Ms. Tveit stated she forwarded Mr. Pulver's report to the Washington State Bar Association, and went on to state that she had:

*"...no intentions of using the information contained in the report during my campaign. I can truly say that I had never considered this a campaign expenditure, which commonly would include expenses for such items as campaign signs, advertising, brochures, etc..."*

3.24 On June 12, 2014, Mr. Perkins sent an email to Ms. Tveit acknowledging her May 29, 2014 response email, and asking her to respond to staff's additional questions concerning the in-kind contribution from her father, Mr. Ghramm. Staff's questions included: (1) Did Ms. Tveit understand that Mr. Clay was considering running for Stevens County District Court Judge? (2) Who sponsored the investigative services of Ted Pulver, and when were those services engaged by her father? (3) Would her father have engaged Mr. Pulver's services if Mr. Clay had not been a candidate? and (4) Has her father incurred the costs for investigative services on her behalf in other instances?

3.25 On June 20, 2014: Ms. Tveit responded to Mr. Perkins' five questions and stated that she did assume Mr. Clay was going to be running for Stevens County District Court Judge in 2014 when she was having discussions with her father, Gary Ghramm. She stated that Mr. Ghramm "...*sponsored Mr. Pulver's investigation and it was his decision to do so...*"

3.26 Ms. Tveit stated that she believed her father engaged Mr. Pulver's services sometime in January of 2014. She stated that she believed her father would not have engaged Mr. Pulver's services, but for the fact that Mr. Clay was a potential opponent in Judge Tveit's campaign for Stevens County District Court Judge. She stated that she was not aware of any other instances in which her father had engaged investigative services of that nature.

3.27 Ms. Tveit went on to state

*"It is important that the information developed from the investigation has not been used by my campaign. The investigation report was immediately turned over to the Washington State Bar Association according to my obligation under the Judicial Rules of Conduct."* At the end of the email, Judge Tveit stated, *"If I were to publically disclose the expense at this time, what would happen next?"*

3.28 Mr. Perkins replied to Ms. Tveit's email, and advised her to report the costs for the investigator either as an in-kind contribution from her father or as a reimbursement from the campaign to her father for the amount of the over-limit portion of the contribution. On July 31, 2014, Mr. Perkins followed-up with an additional email stating that the investigative costs had not yet been reported by the Tveit campaign. He asked Ms. Tveit whether she intended to report the costs on the PDC reports.

- 3.29 On August 4, 2014, Ms. Tveit replied that she intended to proceed as advised by Mr. Perkins, but she wants to talk with PDC staff in more detail concerning the complaint. On August 12, 2014, Ms. Tveit informs staff by email that she has mailed her C-3 and C-4 reports, but she still wanted to talk about the complaint.
- 3.30 On August 13, 2014, PDC received the C-4 report from the Tveit campaign, however the report failed to disclose the costs of the investigator, either as an in-kind contribution from Mr. Ghramm, or as a monetary expenditure from the campaign reimbursing Mr. Ghramm for the over-limit portion of the contribution.
- 3.31 On February 2, 2015, the Campaign filed a C-4 report disclosing the May 12, 2014 receipt of \$4,500 in-kind contribution from Mr. Ghramm, which exceeded the 2014 primary contribution limits of \$1,800 by \$2,600. The C-4 report also disclosed that the Campaign owed a \$2,600 outstanding debt or obligation to Mr. Ghramm for the over-limit portion of the contribution. This was the first-time the campaign disclosed the in-kind contribution from Mr. Ghramm, more than a year after Mr. Ghramm retained the investigative services of Mr. Pulver.

**Allegation No. 3: Failure to timely file a Candidate Registration (RCW 42.17A.205)**

- 3.32 RCW 42.17A.205 requires candidates to file a C-1 report within two weeks after the date the campaign first: (1) Solicits contributions or has the expectation of receiving contributions; (2) Reserves space, orders campaign goods or services, or makes expenditures in any election campaign; or (3) Files a Declaration of Candidacy or makes a public announcement, whichever is earlier.
- 3.33 Ms. Tveit stated that she assumed Mr. Clay was going to be running for Stevens County District Court Judge in 2014, and that her father engaged Mr. Pulver's services sometime in January of 2014.
- 3.34 On February 11, 2014, Michael Clay filed a C-1 report registering his candidacy.
- 3.35 Ms. Tveit stated that she doubted her father would have engaged Mr. Pulver's services if Mr. Clay had not been a potential candidate for Stevens County District Court Judge. Based on statements she made that Mr. Ghramm first paid for Mr. Pulver's investigative services of Michael Clay on her behalf sometime in January of 2014, she was required to file a C-1 report within two weeks or not later than February 13, 2014. The C-1 report was filed 100 days late.

**Gina Tveit Responses:**

- 3.36 In 2014, Ms. Tveit stated that her opponent, Mr. Clay "*...ran a very negative campaign. He let it be widely known during the campaign that he had just inherited a significant amount of money and was willing to spend whatever it took to win the election. I became worried about the effect of his constant negativity, which included negative weekly newspaper advertising and negative direct mailings....*"

- 3.37 Ms. Tveit stated that for those reasons, she consulted with Mr. Hanley who contracted with Red Maverick Media to produce the three political advertisements and the telephone poll. She stated the telephone poll “...was designed to measure name recognition and to try to determine what effect my opponent’s constant negative campaigning was having. I ended up deciding to send out the direct mailers starting when the general ballots were mailed out....;”
- 3.38 Ms. Tveit stated her name did not appear on the 2014 primary election ballot, and that she intended to file her PDC reports disclosing her campaign expenses, but that she was delayed due to her difficulties in filing the reports electronically. She stated that her campaign remained positive throughout, despite the fact she:
- “...had very damaging information on my opponent from the results of the private investigator’s report, I never used this information in my campaign. Even though I was well aware of my opponent’s reputation within the legal community, I was shocked at the details contained in the report. Therefore, when I received a copy of the report, I immediately forwarded it the WSBA....”*
- 3.39 Ms. Tveit stated that she has not received any updates concerning the status of the Washington State Bar Associations investigation into Mr. Clay.

#### IV. Scope

- 4.1 PDC staff reviewed the following:
- The complaints filed against Gina Tveit by Michael Clay;
  - Campaign finance reports, including C-1, C-3 report and C-4 reports, filed by Gina Tveit for the 2014 election, and for the 2010 election;
  - Results of PDC database query;
  - Email exchanges between Ms. Tveit and PDC staff member Tony Perkins;
  - Response from Ms. Tveit.

#### V. Law

- 5.1 **RCW 42.17A.205** requires candidates to file a Candidate Registration within two weeks of: filing for office or making a public announcement; after the date the campaign first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier.
- 5.2 **RCW 42.17A.235 and .240** require political candidates to file timely, accurate reports of contributions and expenditures, including in-kind contributions. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election, and in the month following the election, regardless of the level of activity. Contributions are reported weekly during this same

time period, and must be disclosed on Monday for contributions deposited the previous seven days.

- 5.3 **RCW 42.17A.405** states that candidates for judicial offices are subject to state contributions limits, which for the 2014 election cycle was \$1,800 per election for contributions received from an individual, corporation, union, political committee or other entity. Contributions made for the 2014 primary election were required to have been received by August 5, 2014, the date of the primary election.
- 5.4 **RCW 42.17A.245** states, “(1) Each candidate or political committee that expended five thousand dollars or more in the preceding year or expects to expend five thousand dollars or more in the current year shall file all contribution reports and expenditure reports required by this chapter by the electronic alternative provided by the commission under RCW 42.17A.055. The commission may make exceptions on a case-by-case basis for candidates whose authorized committees lack the technological ability to file reports using the electronic alternative provided by the commission. (2) Failure by a candidate or political committee to comply with this section is a violation of this chapter.”

Respectfully submitted this 12<sup>th</sup> day of June, 2015.

  
Kurt Young  
PDC Compliance Officer

#### List of Exhibits

- Exhibit #1** May 8, 2014, complaint filed by Michael Clay with the Public Disclosure Commission against Gina Tveit.
- Exhibit #2** Candidate Registration filed by Gina Tveit on May 24, 2014, declaring her candidacy for re-election as Stevens County District Court Judge in 2014.
- Exhibit #3** May 29, 2014, email transmitted by Ms. Tveit to PDC staff concerning her declaration of candidacy, the filing of her C-1 report, and additional allegations in the complaint.
- Exhibit #4** March 17, 2015, email transmitted by Ms. Tveit to PDC staff in response to staff's February 23, 2015, email and letter requesting additional information in PDC Case No. 15-045
- Exhibit #5** March 18, 2015, email transmitted by Ms. Tveit to PDC staff attaching a copy of the “sample survey script” and three invoices from Red Maverick Media for three direct mail pieces.
- Exhibit #6** February 2, 2015, C-3 and C-4 report filed manually on paper by Ms. Tveit disclosing contribution and expenditure activities undertaken prior to the election.





STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH RCW 42.17A

Gina Tveit

Respondent.


PDC Case No. 15-045

Addendum to Report of  
Investigation

**I.**  
**Addendum**

- 1.1 The Campaign filed a combined June and July C-4 report on August 11, 2014, covering the reporting period of June 10 through August 10, 2014. The C-4 report disclosed that \$7,322.42 was received in monetary contributions during this period. A C-3 report totaling \$7,322.42 was also received on August 11, 2014, showing \$6,000 as coming from the candidate's own funds, but not showing a date received, and \$1,322.42 coming from other contributors between July 4 and August 2, 2014. The C-4 report disclosed campaign expenditures totaling \$7,210 during the months of June and July, 2014.
- 1.2 The June 2014 portion of the expenditures totaled \$6,551. The June expenditures included: (1) Three expenditures to Stick-It Signs totaling \$4,767; (2) An \$872 expenditure to Campaign Pros for political advertisements in form of pens and notebooks; and (3) A \$543 expenditures to Colville Printing for campaign brochures. A June C-4 report was due by July 10, 2014, and the expenditures required to be disclosed on this report were filed 32 days late. **(Exhibit 1 to Addendum)**
- 1.3 The Campaign filed its C-3 and C-4 reports manually, on paper, rather than by the required electronic method. The Campaign did not request an exemption from the electronic filing requirement. On November 4, 2014, PDC staff sent a warning letter to Ms. Tveit stating that the required reports must be filed electronically to avoid enforcement action and a possible monetary penalty. **(Exhibit 2 to Addendum)**

Respectfully submitted this 9<sup>th</sup> day of July, 2015.

  
Kurt Young  
PDC Compliance Officer

**BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON**

In the Matter of Enforcement Action  
Against:

Gina Tveit

Respondent.

Case No. 15-045

STIPULATION AS TO FACTS

The parties to this Stipulation, namely, the Public Disclosure Commission Staff, through its Executive Director, Evelyn Lopez, and Respondent Gina Tveit, through her attorney, Jerry J. Moberg, submit this Stipulation as to Facts in this matter. The parties agree that the Commission has the authority to accept, reject or modify the terms of this Stipulation. The parties further agree that in the event that the Commission suggests modification to any term of this agreement, each party reserves the right to reject that modification. In the event either party rejects a modification, this matter will proceed to hearing before the Commission.

**JURISDICTION**

The Public Disclosure Commission has jurisdiction over this proceeding pursuant to RCW 42.17A, the state campaign finance and disclosure laws; RCW 34.05, the Administrative Procedure Act; and WAC 390.

**FACTS**

1. Gina Tveit was elected Stevens County District Court Judge in the November 2, 2010 general election. On May 24, 2014, Ms. Tveit filed a C-1 report registering her candidacy for re-election in 2014. There was no primary election held for the office. Ms. Tveit was elected Stevens County District Court Judge in the November 4, 2014 general election.
2. In the winter of 2013, Ms. Tveit and her father, Gary Ghramm, discussed a rumor that Michael Clay was considering running for Stevens County District Court Judge. Ms. Tveit's

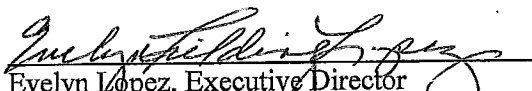
father expressed concerns to Ms. Tveit concerning alleged inappropriate professional conduct by Mr. Clay, in his capacity as a deputy prosecutor or contracted public defender. Mr. Ghramm engaged the services of Ted Pulver, a private investigator, to investigate the alleged past conduct of Michael Clay, sometime in January 2014. The results of the investigation by Ted Pulver were never used by Ms. Tveit in any manner during her campaign.

3. Public Disclosure Commission Staff allege that because Mr. Ghramm's expenditures for investigative services were conducted in consultation with Ms. Tveit, they constituted an in-kind contribution to her 2014 general election campaign. Ms. Tveit was therefore required to file a C-1, registering her candidacy, within two weeks of the date she was informed of her father's activities, or by no later than February 13, 2014. She filed a candidate registration on May 24, 2014, 100 days after February 13, 2014. Ms. Tveit disputes these claims.
4. After the PDC staff started a formal investigation and on the recommendation of the PDC staff Ms. Tveit reported the value of Ted Pulver's services as a \$4,500 in-kind contribution from her father for the 2014 primary election. Ms. Tveit did not agree that it was an in-kind contribution but believed that the PDC would drop the matter if she reported the value of the services as an in-kind contribution. Mr. Ghramm's limit to Ms. Tveit's campaign for the 2014 primary election was \$1,800.
5. The Campaign received monetary and in-kind contributions totaling \$46,679, with an equal amount of expenditures. Of this amount, Ms. Tveit contributed \$40,207 in personal funds which represented 86.5 percent of all contributions received.
6. The Campaign filed its June 2014 C-4 report 32 days late, on August 11, 2014. The report, due July 10, 2014, included expenditures totaling \$6,551, of which \$6,182 was for political advertising materials.
7. The Campaign was required to file a C-3 report by October 6, 2014, disclosing receipt of \$24,791 in personal funds from Ms. Tveit on October 1, 2014. The Campaign did not report the contribution until February 2, 2015, 119 days late and nearly three months after the 2014 general election. The late-reported contribution represented 53.1 percent of all contributions received by the Campaign.

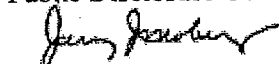
8. The Campaign failed to timely disclose \$22,113 in direct mail and newspaper political advertising orders on the 21-day pre-general election C-4 report due on October 14, 2014. The orders placed were disclosed 111 days late on February 2, 2015, in a combined C-4 report covering the period of October 14, 2014 through December 10, 2014.
9. The Campaign failed to timely file its 7-day Pre-General election C-4 report by October 28, 2014, and its Post-General election C-4 report by December 10, 2014. The 7-day C-4 report was filed 97 days late, and the Post-General election C-4 report was filed 54 days late, both on February 2, 2015. The late reported activities included:
  - 1) A \$24,791 deposit of contributions from Ms. Tveit's personal funds; and
  - 2) \$24,791 in campaign expenditures for political advertising.

These expenditures were reported 97 days late.

10. Public Disclosure Commission Staff further allege: that the \$4,500 in-kind contribution received from Mr. Ghramm for the cost of hiring a private investigator to investigate Mr. Clay was reported at least 265 days late; and that \$2,600 in outstanding debts or obligations owed to Mr. Ghramm to repay the over-limit portion of his in-kind contribution was reported late. Ms. Tveit disputes these claims.
11. The Campaign filed its C-3 and C-4 reports manually on paper, rather than by the required electronic method. The campaign was required to file electronically because it raised and spent over \$5,000. The Campaign did not request an exemption from the electronic filing requirement, and therefore failed to report electronically.
12. Ms. Tveit handled the campaign primarily on her own. She was not familiar with all of the filing requirements. She did not intentionally fail or refuse to file any report and she made a full disclosure of her campaign contributions, mostly self-contributions, and her expenses.

  
 Evelyn Lopez, Executive Director  
 Public Disclosure Commission

10/13/2015  
 Date Signed

  
 Jerry J. Moberg, Attorney for Respondent Gina Tveit

10/13/15  
 Date Signed

Gina Tveit, Case No. 15-045  
Comparable Cases of Past Violations

Name of Respondent	Year of Hearing	Facts Relevant to Violations	Prior Violations	Penalty	Inflation Adj. (Rounded to nearest \$50)
James Fossos	2013	James Fossos, a 2011 candidate for reelection as Fire Commissioner in South King Fire and Rescue, failed to timely disclose expenditures and in-kind contributions totaling \$15,632 for political advertising, including newspaper advertising, printing and mailing, and signs on C-4 reports, and failed to timely disclose monetary contributions on C-3 reports. \$3,201 was reported six days late but before the general election, and \$12,431 was reported 133 to 264 days late and more than four months after the general election. Monetary contributions totaling \$1,510 was reported on C-3 reports after the election.	N/A	\$750 with \$250 suspended.	N/A
Tom Stiger	2012	2009 candidate for Port of Everett Commissioner. Failed to file any C-4 reports during the 2009 campaign, so no expenditures or in-kind contributions disclosed until at least 18 months after the election. Failed to timely file two C-3 reports of contributions. Failed to file by the required electronic method. Approximate value of un/late-reported activity: \$52,000. No information regarding mitigating circumstances but Respondent took full personal responsibility.	N/A	\$3,000 with \$2,000 suspended	\$3,100 with \$2,050 suspended
Zona Lenhart	2011	Zona Lenhart, was a 2010 candidate for reelection for Franklin County Auditor. She failed to timely report contributions totaling \$13,201, filed 16-188 days late, and \$11,577 in expenditures, 13-72 days late. She failed to file her C-3 and C-4 reports using the required electronic alternative until after the general election, and accepted contributions that were over the allowable limit by \$7,400.	N/A	\$4,200	\$4,450

Historical adjustments in Commission's civil penalty authority:  
2011 - \$10,000 max (single or multiple violations)  
2006 - \$1,700/violation, up to max of \$4,200  
1985 - \$1,000/violation, up to max of \$2,500  
1976 - \$250/violation, up to max of \$500