

6 Reasons to Repeal Employer City/State Requirement

1) The term “address of their employer” used in WAC 390 is ambiguous, and open to multiple divergent interpretations.

As Commissioners Downing and Hayward brought up in response to my bringing up the Boeing example at the January meeting, there is no real clarity on what the true address of an employer is as contemplated by the WAC. Conceivably, it could be any number of locations. The address could be where the employer is incorporated, it could be the state headquarters, it could be the national headquarters, it could be the international headquarters, it could be the physical location where the employee actually shows up to work, conceivably it could even be a person’s home address if they are self-employed or work primarily from home. As someone who processes a lot of these contributions, I can tell you that different people interpret this requirement differently.

Furthermore, what should someone list as their occupation if they have multiple jobs or sources of income? Should they be listing the occupation that brings them in the most amount of money? Or the occupation that the individual spends the most time working at? Unless these questions can really be addressed, there is no uniformity of the data provided to the PDC, which negatively affects the value of the data.

2) When viewing contribution information on the PDC’s website using the Campaign Explorer (which is the typical way that most members of the public view contribution information), the city and state where a donor’s employer is located is not even visible.

The fact that this information is not visible to members of the public in the most common way that people access contribution information suggests that it would be no great loss if the requirement were repealed. (See example below for Gov. Inslee’s 2020 campaign contributors, **note that the city and state of a person’s employer is not present**. See link: <https://www.pdc.wa.gov/political-disclosure-reporting-data/browse-search-data/candidates/1219/contributions>)

10/06/2020	ANDERSON ERIC	BELLEVUE	WA	Cash	General	SPACE ADVENTURES	EXECUTIVE	\$2,000.00	View Report
08/21/2020	RAIKES JEFF	SEATTLE	WA	Cash	General	SELF	PHILANTHROPIST	\$2,000.00	View Report
07/27/2020	WEGE DIANA	NEW YORK	NY	Cash	Primary	SELF	ARTIST	\$2,000.00	View Report
09/30/2019	CORNFIELD DAVID J	SEATTLE	WA	Cash	Primary	NONE	RETIRED	\$2,000.00	View Report
09/30/2019	CORNFIELD LINDA	SEATTLE	WA	Cash	General	NONE	RETIRED	\$2,000.00	View Report
07/27/2020	WEGE DIANA	NEW YORK	NY	Cash	General	SELF	ARTIST	\$2,000.00	View Report
09/10/2019	FEICHTMEIR PETER	SEATTLE	WA	Cash	Primary	TECTON SMP INC.	RE EXECUTIVE	\$2,000.00	View Report
09/24/2019	SULLIVAN JOHN R	HOUSTON	TX	Cash	Primary	DRC EMERGENCY SERVICES	PRESIDENT	\$2,000.00	View Report
09/24/2019	SULLIVAN JOHN R	HOUSTON	TX	Cash	General	DRC EMERGENCY SERVICES	PRESIDENT	\$2,000.00	View Report
08/01/2020	HANAUER ADRIAN	SEATTLE	WA	Cash	General	SEATTLE SOUNDERS FC	OWNER	\$2,000.00	View Report
09/10/2020	CRAFT CANNABIS COALITION PAC	TACOMA	WA	Cash	General			\$2,000.00	View Report
08/01/2020	HANAUER ADRIAN	SEATTLE	WA	Cash	Primary	SEATTLE SOUNDERS FC	OWNER	\$2,000.00	View Report
08/01/2020	TRAN KHANH T	SEATTLE	WA	Cash	General	NONE	NOT EMPLOYED	\$2,000.00	View Report
10/06/2019	PATE ANTHONY	SHERWOOD	OR	Cash	Primary	NONE	NOT EMPLOYED	\$2,000.00	View Report
07/23/2020	SIEGALL CLAY B	WOODWAY	WA	Cash	General	SEATTLE GENETICS	EXECUTIVE	\$2,000.00	View Report

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Conner Edwards**

3. The disclosure of the city and state where a donor's employer is located is not useful information for voters.

As mentioned above, people interpret the term "address of their employer" in many different ways. One person might interpret the requirement to mean that they have to provide the address where they physically show up at, another person might interpret the requirement to mean they have to provide the address of the employer's national headquarters, etc. etc. Because the requirement is understood differently by different people, the data that contributors provide (and the data that is in turn provided to the public through the PDC's website) is not uniform or accurate. Because the data is not uniform or accurate, I would argue that it is not particularly useful.

However, even if the PDC removed this ambiguity by clarifying what the term "address of their employer" really meant, how is information on where a person's employer is located useful to voters? I believe that it is not.

I would also point out that if a member of the public wanted to figure out where a person's employer is located, that they could simply Google it. That might not have been as possible or easy as it is today compared to when this requirement was first established.

Commissioners Isserlis, Downing, and Jarrett have provided some examples of why they believe the requirement can be helpful in some limited circumstances and I will respond to those examples below.

- a. At the February meeting, Commissioner Isserlis said: *"my preference would be not to change the information that is requested. I just finished a book called 'Sunny Skies Shady Characters' and it's all about political corruption in Hawaii, and there was actually a chapter on this particular issue where an employer was funneling money to his or her employees with instructions to donate and a political reporter uncovered it and it was a big mess so I think that having at least the location of city and state is an important... I wouldn't want to lose that..."*

That's a great point to make in the context of why the employer and occupation requirement is so important. And I agree. **However, I believe this specific example actually bolsters my argument on why the employer city/state requirement is useless.** In Hawaii, they don't have the requirement that the city and state of a contributor's employer be disclosed, and the reporter still figured out what was happening. ¹ This example doesn't touch on why the employer city/state requirement was useful.

- b. At the February meeting, Commissioner Downing said: *"You don't actually have to go to Hawaii because in Seattle we had the same thing with the city council races a number of years ago where there was an employer in Pierce County who owned certain nightspots in King County but who was having various Pierce County employees make contributions that he was reimbursing in Seattle City Council races."*

¹ See attachment at end of document from Hawaii's PDC equivalent.

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Again, where is the connection to how the employer city/state requirement “cracked the case” on this illegal scheme?

Here’s what I believe would have actually tipped the reporters off to this incident:

- a) You had people who reported Pierce County residential addresses (Tacoma, Puyallup, etc.) making contributions to a Seattle City Council candidate which is suspicious.
- b) You had a number of low-level employees from a nightclub making max-out contributions to Seattle City Council candidates **which is suspicious regardless of where the nightclub was located.** (Again if people wanted to see where the nightclub was located, I imagine that was a matter of public record.)

(I attempted to research this example but couldn’t find it in newspaper articles or PDC open data, but if it happened many years ago, that may have been why I couldn’t find it.)

- c. *At a TVW interview recently, Chair Jarrett said: “we just had a request that we eliminate the city and state from the requirement of identifying your employer or contributors and I went back and looked at some 5000 records to see what was interesting about that and what I found was is that when you went back, and this is contribution records, when you went back and looked at those records you would find a lot of companies and some of them had relatively innocuous names like Acme. And there’s a whole bunch of Acmes out there. But when I know it’s Acme from Wahkiakum County, I have a better idea of who is making that contribution and what their interests are...”*

Because Chair Jarrett also referenced this at the February meeting (<https://tvw.org/video/washington-state-public-disclosure-commission-2023021009/?eventID=2023021009> at 33:36 mark), I assume he is referring to the list I provided as public comment, which can be found here: <https://www.pdc.wa.gov/sites/default/files/2023-02/01.04.Comment%20-%20PDC%20Public%20Comment%20February%202023-%20Edwards.pdf>

I found precisely 12 references of Acme that were listed on that spreadsheet. 9 were referencing the town named “Acme” in rural Whatcom County and not a business.

One referenced Acme Construction Supply. A Google search reveals that it is a west coast construction supply company with offices all over, including Seattle. Where is the “aha” moment here?

Two referenced Acme Concrete Paving. A Google search reveals that it is a Spokane-based concrete paving company. Where is the “aha” moment here?

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4. There is no requirement that can be effectively enforced that donors actually provide any employment information.

As I noted at last month's meeting, I recently reached out to PDC staff on the issue of whether or not we are obligated to refund contributions where donors refused to provide employer and occupation information in response to our inquiries. The answer is that **we are not required to refund these contributions**, but instead may report "REQUESTED". A quick search of the PDC's database yielded over 4000 contributions where the donor's occupation was reported as "REQUESTED".

In other words, if a donor wanted to skip out on providing the requested information, they can legally do so.

5. Disclosing a contributor's employer's city/state may expose a contributor to violence, stalking, or harassment.

Under current law, all donors over a certain amount must have their residential address exposed and filed on reports, which are easily searchable online. That has the potential to expose them to violence, stalking or harassment, but this fact is mitigated because individuals can take steps to be more secure in their homes: such as having a security system, dogs, defensive weapons, etc.

Many individuals cannot take these precautions to be more safe in their workplace.

For example, imagine that the residential address of Sally Smith has been disclosed on a form C3 filed online. A potential stalker now has her residential address and can likely account for where she is during most non-working hours. That's bad enough.

But under the current employer city/state requirement, Sally Smith also has to disclose the fact that she is a server at the Java Bean Café in Yelm, which only has one location in Yelm. Now a potential stalker has the ability to further stalk/harass her because now he knows exactly where she works.

And what valuable information do the voters gain from knowing that Sally Smith works as a server at the Java Bean Café and that she works in Yelm specifically? None.

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6. Most states (including largest states) and the FEC (the federal campaign finance authority) do not have this requirement. The FEC does not have this requirement.² California does not have this requirement.³ New York does not have this requirement.⁴ Texas does not have this requirement.⁵ Florida does not have this requirement.⁶

Despite not having a requirement for campaigns to disclose the city and state of a contributor’s employer, these states have not disintegrated into anarchy. Democracy survives and thrives in these states, even in the absence of this odd requirement.

If the employer city/state requirement was actually useful information for voters, you would see it adopted in a larger number of states.

California Example of Contribution Report Info:

FEC Example (From Murray 2022 US Senate Campaign) <https://docquery.fec.gov/cgi-bin/forms/C00257642/1688106/sa/ALL>

Committee: PEOPLE FOR PATTY MURRAY

There are a total of 19166 Itemized Receipts
Displaying 1 through 500

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Contributor's Name	Contributor's Address	Employer/Occupation	Memo/Description	Memo	Text	Date	Amount (\$)	Aggregate (\$)	Limits
Christopher A Pratt	821 N Steele St Tacoma, Washington 984067813	Alaska Airlines / Aviation Management				08/12/2022	250.00	250.00	
Daniel Aarthur	4713 Helena Ave SE Lacey, Washington 985032173	Not Employed / Not Employed	* Earmarked Contribution: See Below			07/20/2022	25.00	240.00	
ActBlue	PO Box 382110 Cambridge, Massachusetts 022382110	Conduit total listed in Agg. field	Note: Above Contribution earmarked through this organization.	MEMO		07/24/2022	25.00	1304539.24	LIMITS
Daniel Aarthur	4713 Helena Ave SE Lacey, Washington 985032173	Not Employed / Not Employed	* Earmarked Contribution: See Below			08/20/2022	25.00	240.00	
ActBlue	PO Box 382110 Cambridge, Massachusetts 022382110	Conduit total listed in Agg. field	Note: Above Contribution earmarked through this organization.	MEMO		08/21/2022	25.00	1304539.24	LIMITS
Daniel Aarthur	4713 Helena Ave SE Lacey, Washington 985032173	Not Employed / Not Employed	* Earmarked Contribution: See Below			09/20/2022	25.00	240.00	
ActBlue	PO Box 382110 Cambridge, Massachusetts 022382110	Conduit total listed in Agg. field	Note: Above Contribution earmarked through this organization.	MEMO		09/25/2022	25.00	1304539.24	LIMITS
Fartun Abdalah	33224 32Nd Pl SW Federal Way, Washington 980232751	Ameerah Childcare / Day Care Worker				08/25/2022	500.00	500.00	
Keith Abel	225 Indian Ct Richland, Washington 993547078	Not Employed / Not Employed	* Earmarked Contribution: See Below			09/13/2022	50.00	612.50	

² <https://www.fec.gov/help-candidates-and-committees/keeping-records/recording-receipts/> (See tab: Contributions aggregating over \$200)

³ <https://www.fppc.ca.gov/learn/campaign-rules/basic-record-keeping-rules-for-treasurers.html> (See tab: Record Keeping - Money In (Contributions))

⁴ <https://www.elections.ny.gov/NYSBOE/download/finance/hndbk2022.pdf> (See pg. 41, 42. Interestingly however, NY does require that people listed on the C-1 equivalent (officers, treasurers, etc) list their occupation and employer with the full employer address. But not for contributors.)

⁵ https://www.ethics.state.tx.us/data/resources/guides/coh_state_guide22.pdf (See pg. 14)

⁶ <https://files.floridados.gov/media/704777/candidate-campaign-treasurer-handbook-2022-04-27-2022-nl.pdf> (See pg. 62)

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California example (From Newsom 2022 Campaign)

https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1414018&session=2021&view=received&psort=FILED_DATE

NAME OF CONTRIBUTOR	PAYMENT TYPE	CITY	STATE / ZIP
SEAN BURKE	MONETARY	IRVINE	CA/92618
ID NUMBER	EMPLOYER	OCCUPATION	
	SEAN M. BURKE, APC	ATTORNEY	
AMOUNT	TRANS. DATE	FILED DATE	TRANS. #
\$1,000.00	10/24/2022	3/1/2023	2781339-IDT218334

NAME OF CONTRIBUTOR	PAYMENT TYPE	CITY	STATE / ZIP
JAMES MCGEE	MONETARY	RIVERSIDE	CA/92503
ID NUMBER	EMPLOYER	OCCUPATION	
	LAW OFFICE OF JAMES MCGEE	ATTORNEY	
AMOUNT	TRANS. DATE	FILED DATE	TRANS. #
\$2,500.00	10/25/2022	3/1/2023	2781339-IDT218760

NAME OF CONTRIBUTOR	PAYMENT TYPE	CITY	STATE / ZIP
GERALDINE LY	MONETARY	SANTA ANA	CA/92705
ID NUMBER	EMPLOYER	OCCUPATION	
	GERALDINE LY	ATTORNEY	
AMOUNT	TRANS. DATE	FILED DATE	TRANS. #
\$1,000.00	10/25/2022	3/1/2023	2781339-IDT218761

New York example (From Hochul 2022 Campaign)

<https://publicreporting.elections.ny.gov/ContributionsByRecipient/ContributionsByRecipient>

Expand	Contribution Date	Amount	Contributor Name	Detail Original Name	Contributor Address	Transaction Type	Contributor Type	Transfer Type	Recipient	Disclosure Report	Committee Type
	05/09/2022	\$1,000.00	A Scott Horak		319 Harbor Dr Lido Beach NY 11561-4906 United States	A - Monetary Contributions Received From Ind. & Part.	Individual		Friends for Kathy Hochul - ID# 16851	2022 State/Local 32-Day Pre-Primary	Authorized Single Candidate Committee
<p>Filer type State</p> <p>Filer County</p> <p>Filer Municipality</p> <p>Filer Office</p> <p>Filer District</p>											
	10/27/2022	\$250.00	A. Christopher Kleine		5501 Wyndfield Ct Hamburg NY 14075-3658 United States	A - Monetary Contributions Received From Ind. & Part.	Individual		Friends for Kathy Hochul - ID# 16851	2022 State/Local 27-Day Post-General	Authorized Single Candidate Committee
	11/17/2021	\$100.00	A. Thomas Levin		95 Buisson Rd Rockville Centre NY 11570-1208 United States	A - Monetary Contributions Received From Ind. & Part.	Individual		Friends for Kathy Hochul - ID# 16851	2022 State/Local January Periodic	Authorized Single Candidate Committee
	09/08/2022	\$1,000.00	Aaron Gelband		212 E 75th St Apt 28BC New York NY	A - Monetary Contributions Received	Individual		Friends for Kathy Hochul -	2022 State/Local 32-Day Pre-	Authorized Single Candidate

Texas example (Abbott 2022 Campaign): <https://www.ethics.state.tx.us/search/cf/SimpleSearch.php>

Unfortunately, the Texas portal appeared to be down as of 3/21/23, as I got a “Service Unavailable” message when I tried to use it.

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Service Unavailable

The page you requested is unavailable.

Please try the following:

- If you believe this is in error and would like to try this page again, [Click Here](#)
- Go to the [Texas Ethics Commission Home Page](#)
- Go to the [Texas Ethics Commission Filing Application](#)
- Use your back button to return to the previous page.

Florida example (DeSantis 2022 Campaign): <https://dos.elections.myflorida.com/cgi-bin/contrib.exe>

Candidate/Committee	Date	Amount	Typ Contributor Name	Address	City State Zip	Occupation	Inkind Desc
DeSantis, Ron (REP)(GOV)	09/14/2022	25.00	CHE J MARTIN STEPHEN L	PO BOX 64	CORTLAND, OH 44410		
DeSantis, Ron (REP)(GOV)	06/06/2022	50.00	CHE J MARTIN STEPHEN L	PO BOX 64	CORTLAND, OH 44410		
DeSantis, Ron (REP)(GOV)	09/12/2022	3,000.00	CHE 081 GATE PETROLEUM COMPANY	P.O. BOX 23627	JACKSONVILLE, FL 32241	PETROLEUM	
DeSantis, Ron (REP)(GOV)	09/11/2022	20.22	CHE I KING LLC	2 DND ST	SAINT AUGUSTINE, FL 32080		
DeSantis, Ron (REP)(GOV)	11/02/2022	500.00	CHE 1-800-DRYHOUT	8348 LITTLE RD # 179	NEW PORT RICHEY, FL 34654	WATER AND HOLD RENOV	
DeSantis, Ron (REP)(GOV)	08/24/2022	1,000.00	CHE 1800 REVERESIDE PARTNERS LLC	1800 REVERESIDE AVE., #100	JACKSONVILLE, FL 32204	RESTAURANT	
DeSantis, Ron (REP)(GOV)	10/26/2022	500.00	CHE 10343 CTY 304, LLC	3202 BAY ESTATES DR	HIRAWAR BEACH, FL 32550	COMMERCIAL REAL ESTA	
DeSantis, Ron (REP)(GOV)	04/20/2022	3,000.00	CHE 1040 SOUTH HIAWAI, LLC	78 S.W. 7TH STREET	HIAWAI, FL 33130	INVESTMENT MANAGEMENT	
DeSantis, Ron (REP)(GOV)	04/29/2022	1,000.00	CHE 1049 GASTLE PTNES LLC	15199 SUREBY BEND	SPRING HILL, FL 34669	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	04/08/2022	100.00	CHE 123 EDI	5690 OAKTREE AVE	FORT LAUDERDALE, FL 33312		
DeSantis, Ron (REP)(GOV)	10/13/2022	251.00	CHE 13 LIVES HATTER.ORG	4621 81ST LN N	KENNESAW CITY, FL 33709	PUBLIC AFFAIRS	
DeSantis, Ron (REP)(GOV)	11/02/2022	500.00	CHE 1800FUELOUY	PO BOX 219	TARPOON SPRINGS, FL 34688	FUEL	
DeSantis, Ron (REP)(GOV)	04/19/2022	100.00	CHE 1982 BERGER TRUST	4310 MARSHALL AVE	CARROLLWOOD, CA 95608		
DeSantis, Ron (REP)(GOV)	05/09/2022	500.00	CHE 1982 CAMPBELL HOLDINGS, LLC	1834N N.W. 87 AVENUE, #204	MIAMI, FL 33015	REAL ESTATE INVESTME	
DeSantis, Ron (REP)(GOV)	04/02/2022	250.00	CHE IDRAFTING LLC	32801 US HIGHWAY 441 N	ORKEENHOBEE, FL 34972	FREELANCE CAD DRAFTI	
DeSantis, Ron (REP)(GOV)	04/02/2022	250.00	CHE IDRAFTING LLC	32801 US HIGHWAY 441 N	ORKEENHOBEE, FL 34972	FREELANCE CAD DRAFTI	
DeSantis, Ron (REP)(GOV)	04/03/2022	-250.00	REF IDRAFTING LLC	32801 US HIGHWAY 441 N	ORKEENHOBEE, FL 34972	FREELANCE CAD DRAFTI	
DeSantis, Ron (REP)(GOV)	10/18/2022	35.00	CHE I KING LLC	1 KING ST	SAINT AUGUSTINE, FL 32084		
DeSantis, Ron (REP)(GOV)	07/01/2022	200.00	CHE 2007 SHANNINGHAM TRUST	2071 SHANNINGHAM WAY	TUNTER, GA 30750	TRUST	
DeSantis, Ron (REP)(GOV)	11/29/2021	1,000.00	CHE 2013 CENTRAL PARK IV, LLC	10739 DEERWOOD PARK BLVD., SUITE 310	JACKSONVILLE, FL 32256	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	12/21/2021	3,000.00	CHE 2018 FINISH LINE, LLC	2380 JAMESTOWN ROAD	FERNIWADINA BEACH, FL 32034	SPORTS APPAREL	
DeSantis, Ron (REP)(GOV)	10/12/2022	30.00	CHE 2028FECARE	8051 W 24TH AVE	MIAMI, FL 33016		
DeSantis, Ron (REP)(GOV)	10/12/2022	100.00	CHE 2028FECARE	8051 W 24TH AVE	MIAMI, FL 33016		
DeSantis, Ron (REP)(GOV)	05/09/2022	250.00	CHE 208 CLUB DRIVE LLC	18 CHASE HURDLE DR	MIAMI, FL 33133	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	01/10/2022	50.00	CHE 212-47 JAMAICA AVENUE REALTY CORP.	21247 JAMAICA AVE.	QUEENS VILLAGE, NY 11420		
DeSantis, Ron (REP)(GOV)	12/18/2021	25.00	CHE 215T CENTURY SIGHT SOUND, LLC	PO BOX 885	ESTERO, FL 33929		
DeSantis, Ron (REP)(GOV)	06/08/2022	300.00	CHE 223 ABBEY	223 W CAROLINA ST	TALLAHASSEE, FL 32301	MARKETING	
DeSantis, Ron (REP)(GOV)	12/15/2021	2,299.13	3MK 2383 JAMESTOWN ROAD, LLC	2380 JAMESTOWN RD.	FERNIWADINA BEACH, FL 32034	HEALTHCARE	FOOD & BEVERAGE
DeSantis, Ron (REP)(GOV)	08/10/2022	50.00	CHE 2398ALEXANDERALS.COM LLC	1525 23RD ST SW	NAPLES, FL 34117		
DeSantis, Ron (REP)(GOV)	09/30/2022	250.00	CHE 2797 JEAN LAFITTE DR	2797 JEAN LAFITTE DR	FERNIWADINA BEACH, FL 32034	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	08/24/2022	30.00	CHE 2825 SHERIDAN PROPERTY LLC	1788 AMBASSADOR AVE	BEVERLY HILLS, CA 90210		
DeSantis, Ron (REP)(GOV)	11/30/2021	3,000.00	CHE 2935-2921 AVE N, PROPERTIES, LLC	2740 NOSTRAND AVE.	BROOKLYN, NY 11210	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	11/30/2021	3,000.00	CHE 2917 NOSTRAND, LLC	2740 NOSTRAND AVE.	BROOKLYN, NY 11210	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	07/09/2022	501.00	CHE 360 HOSPITALITY LLC	301 TUCKER LN	COCONO, FL 32936	HOTEL	
DeSantis, Ron (REP)(GOV)	11/30/2021	3,000.00	CHE 39TH ST. PROPERTIES, LLC	2740 NOSTRAND AVE.	BROOKLYN, NY 11210	REAL ESTATE	
DeSantis, Ron (REP)(GOV)	02/07/2022	100.00	CHE 3485 CORPORATION	360 MOTOR PKWY STE 200B	HAUPPAUGE, NY 11788		
DeSantis, Ron (REP)(GOV)	07/15/2022	100.00	CHE 350 RESTORATION	4707 SOVE HOUJI	TEXARKANA, TX 75701		
DeSantis, Ron (REP)(GOV)	01/08/2022	3,000.00	CHE 3HG SOLUTIONS	1421 PLACE PICARDY	HINTER PARK, FL 32789	ROOFING CONTRACTOR	
DeSantis, Ron (REP)(GOV)	01/08/2022	3,000.00	CHE 3HG SOLUTIONS	1421 PLACE PICARDY	HINTER PARK, FL 32789	ROOFING CONTRACTOR	
DeSantis, Ron (REP)(GOV)	01/10/2022	-3,000.00	REF 3HG SOLUTIONS	1421 PLACE PICARDY	HINTER PARK, FL 32789		
DeSantis, Ron (REP)(GOV)	08/31/2022	100.00	CHE 35 TECHNICAL SERVICES	829 ANNETTE CT	NEST PALM BEACH, FL 33413	BROADCAST ENGINEERIN	
DeSantis, Ron (REP)(GOV)	04/26/2022	100.00	CHE 40 WIKMS LLC	1918 FOLLOU THRU RD N	SAINT PETERSBURG, FL 33710		

Hawaii example (Green 2022 Campaign): https://csc.hawaii.gov/CFSPublic/ccadmin_file_sa/

SCHEDULE A - CONTRIBUTIONS RECEIVED				
Name and Address	Employer Occupation Non-Resident	Date Non-Monetary Category Non-Monetary Description	Amount	Aggregate
Moad, Patricia 1003 Bishop Street #2350 Honolulu HI 96813	VP of Operations Continental Assets Management <input type="checkbox"/>	11/14/2022	\$1,000.00	\$1,000.00
Bhan, Asheer 4 Springpointe Drive Newtown Square PA 19073	Not Employed Not Employed <input checked="" type="checkbox"/>	11/14/2022	\$500.00	\$500.00
Mincucci, Ben 4311 E. Lake Sammamish Pkwy. SE Issaquah WA 98029	Management Alaska Airlines <input checked="" type="checkbox"/>	11/14/2022	\$500.00	\$500.00
Schreiber, Dan 1888 Viking Way La Jolla CA 92037	Real Estate Bayview Banyan <input checked="" type="checkbox"/>	11/14/2022	\$6,000.00	\$6,000.00
Busse, Richard 721 Spring Street Santa Rosa CA 96404	Psychologist Self-Employed <input checked="" type="checkbox"/>	11/14/2022	\$300.00	\$300.00
Howard, Robert 520 Rose Lane Wickenburg AZ 85390	Financial Analyst Boiling Point Resources <input checked="" type="checkbox"/>	11/14/2022	\$119.75	\$119.75

Fwd: [EXTERNAL] Campaign Finance Question

Conner Edwards <conneredwards878@gmail.com>
To: "CG.Edwards53@gmail.com" <CG.Edwards53@gmail.com>

Tue, Mar 21, 2023 at 2:48 PM

----- Forwarded message -----

From: **Hawaii Campaign Spending Commission** <csc@hawaii.gov>
Date: Mon, Jan 9, 2023 at 5:26 PM
Subject: RE: [EXTERNAL] Campaign Finance Question
To: Conner Edwards <conneredwards878@gmail.com>

Aloha Conner,

You are not required to disclose the address of the employer of the contributor.

Mahalo,

Janelle Tanna

Elections Assistant

Hawaii Campaign Spending Commission

235 S. Beretania Street, Room 300

Honolulu, Hawaii 96813

Phone: (808) 586-0285

Fax: (808) 586-0288

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From: Conner Edwards <conneredwards878@gmail.com>
Sent: Thursday, January 5, 2023 6:39 PM
To: Hawaii Campaign Spending Commission <csc@hawaii.gov>
Subject: [EXTERNAL] Campaign Finance Question

Hello,

I was hoping you could help me answer a question about Hawaii's state campaign finance law.

I know that we are required to disclose a contributor's employer and occupation for donations over a certain amount, but are we required to disclose the address or the city or state in which the employer is located?

Please let me know.

Best,
Conner Edwards