

Honorable Bob Ferguson  
Washington State Attorney General  
PO Box 40100  
Olympia, WA 98504

Mr. Dan Satterberg  
King County Prosecuting Attorney  
King County Courthouse  
516 Third Ave Rm 400  
Seattle, WA 98104

Mr. Mark Lindquist  
Pierce County Prosecuting Attorney  
930 Tacoma Avenue South  
Room 946  
Tacoma, WA 98402

Mr. Dan Heid  
Auburn City Attorney  
25 W. Main St  
Auburn, WA 98001

Elizabeth Miller



Bailey Stober



October 23, 2017

Dear Attorney General Ferguson, Prosecuting Attorney Satterburg, Prosecuting Attorney Linquist and City Attorney Heid,

Please accept this as a formal complaint and request for action against Auburn Deputy Mayor Largo Wales for her clear violations of RCW 42.17A.555 which regulates the use of public office or agency facilities in campaigns. Other violations include, but are not limited to:

RCW 42.17A.235, .240 Failure to report contributions and expenditures.

RCW 29A.84.620 Hindering or bribing voter.

RCW 42.17A.320: Identification of sponsor.

RCW 42.17A.330: Picture of candidate.

RCW 42.17A.555: The unauthorized use of public facilities and resources to support a political campaign.

And the potential violation of:

RCW 9A.68.040: Trading in public office.

RCW 42.17A.430 Disposal of surplus funds.

Currently in the City of Auburn there is a very contentious Mayoral election. Unfortunately the ugliness of this race has gotten to levels beyond unethical, and has turned the corner to illegal. The fact that the election is only weeks away and nothing is being done has us seriously concerned for our city.

As a nation we want to ensure that our laws and constitution are followed. Locally, we I want to ensure our city does not see the same distress the other Washington currently is facing simply because someone thinks they're above reproach and can brazenly break campaign finance and campaign laws because they are not being held accountable.

In July Elizabeth Miller submitted a complaint to the PDC, case 23492, because she had noted several discrepancies in the campaign reporting of Largo Wales for Mayor.

<https://www.pdc.wa.gov/browse/cases/23492>

Since her complaint became active (August 10th, she was notified on August 14th), she has regularly been updating her contact at the PDC with new information she has come across regarding Ms. Wales' questionable campaigning. She have been repeatedly told that they are investigating and will inform her of when a disposition in the matter is reached, but the closer we get to the election the more less confident we are that a resolution will be seen.

Weekly C3 reports and monthly C4 reports are due to the PDC, as per their published schedule, to ensure transparent campaigning. Ms. Wales has never complied with this on schedule, and when she has filed, has regularly omitted items. No expenditures for Largo Wales' campaign have been filed since August 31, 2017. That is nearly 2 months without an expenditure, or essentially the entire general election. *RCW 42.17A.235, .240 failure to report contributions and expenditures.*

Items that we are aware of that have not been listed in expenditures:

-A minimum of 6 mass mailers have been sent out.

-14 small ads have run in the weekly Auburn Reporter print newspaper as per the ads' numbering (at political pricing) and only 4 have been documented in her expenditures.

-At least 2 half page ads in the weekly Auburn Reporter print newspaper – with at least on (see below) violating *RCW 42.17A.320: Identification of sponsor.*

-2 television commercials, neither the production of nor payment for running have been documented.

-2 online produced commercial videos

<https://www.facebook.com/ElectLargo/videos/2130168540543250/>

(Violates *RCW 42.17A.320: Identification of sponsor.*)

<https://www.facebook.com/ElectLargo/videos/3361640047284>

- Facebook sponsored ads
- Electlargo.com website (Violates RCW 42.17A.320: *Identification of sponsor*)
- Training from a company in Bellevue to build and maintain website (Ms. Wales personally told Elizabeth Miller of this.)
- At least 5 campaign events (neither in-kind nor expenditures listed): March 1st kickoff event (event rent listed on 2/1, no other expenditures), March 20<sup>th</sup> coffee and endorsement event, Sunbreak Café June 22nd, Auburn Wine and Caviar July 29<sup>th</sup>, Lakeland Community Center Open House Sept 28th
- Multiple paid social media staffer to manage her Facebook (Ms. Wales personally told Elizabeth Miller of this.)
- Mayor's Golf Tournament and 27th Annual Kiwanis Golf Tournament hole sponsorship
- Rotary scholarship show
- Campaign T-shirts
- Automated Robo-calls
- Campaign Car magnets and stickers (*fee may be under \$50*)
- Clean Sweep, 4th of July, Auburn Day parade registration fees (*fee may be under \$50*)

In response to Ms. Miller's July 17, 2017 PDC complaint, Largo Wales submitted a response admitting to paying out of pocket personally for items. This response is an implications that Ms. Wales feels she does not need to log expenditures she personally has paid for, and raises a great deal of concern.

Further items of concern are that on July 25, 2017 an e-mail was sent out to customers by Jim Wilson owner of Auburn Wine and Caviar boasting of a Largo Wales night (held July 29, 2017). He offered 50% off of any individual's first glass of wine who voted for Largo. Ms. Wales was at this event. Ms. Miller brought this to the attention of the SOS and was told to report it to the PDC. She did so, and has seen no result. *Violation of RCW 29A.84.620*

In reviewing Largo Wales' history, when she last ran for City Council it is our understanding that she had funds remaining in her campaign accounts. As this campaign is for Mayor and not City Council, she would need permission to use those funds for this campaign. Though not 100% certain these funds were utilized, (especially as Ms. Wales' campaign accounting has not been properly maintained) but do know not all that donated to her prior campaign were asked or granted permission for those funds to be used in this current campaign. Potential violation of *RCW 42.17A.430 Disposal of surplus funds*.

On June 29, 2017 Bailey Stober submitted a public records request to the City of Auburn for communication via email, phone, cellphone and text, and browsing history that Largo Wales made or received, or did on any and all city issued devices from October 1, 2016 to that date. In the first batch of his results, Mr. Stober found the following clear violations of *RCW 42.17A.555 - the unauthorized use of public facilities and resources to support a political campaign*:

In the records several text messages were provided from Deputy Mayor Wales city provided cell phone. This is a phone provided to elected officials to conduct official government business and is paid for by the taxpayers and citizens of the city. On 5/30/2017 there is a text message exchange between (253) 329-4029 and (253) 261-5421 that reads "not sure if you're teaching or not but I woke up this morning feeling ill. I will not be able to go doorbell with you. I'm feeling horrible not sure if it was something we eat last night. Talk with you later I'm staying in bed!" The phone number ending in 5421 is the

government issued phone used by Deputy Mayor Wales. A search of the phone number ending in 4029 shows the phone is a city issued phone that was issued to Councilmember Yolanda Trout Manuel. This means that Councilmember Trout Manuel used her government issued phone to text Deputy Mayor Wales' government issued phone to discuss their plans to "doorbell" for Deputy Mayor Wales's campaign.

Again on 4/26/17 there is an exchange between the two elected officials and it reads "Hey I'm sorry left you message telling you can't make it! UPS is an hour 1/2 away from delivering to my house! That won't give us time to go doorbell when I have to be in Federal Way by 5:30pm for my MSC committee! Can you do it tomorrow 11:00 to 1:00pm?"

Again on 4/21/17 there is an exchange between the two elected officials and it reads "Here's my city phone: 253-329- 4029." This exchange clearly shows the acknowledged of utilizing of city resources for these conversations.

On October 16, 2017 Elizabeth Miller did a records request for emails Ms. Wales forwarded to her home address "[lawales@comcast.net](mailto:lawales@comcast.net)." This request produced an email receipt from the Auburn Area Chamber of Commerce for Invoice 031337A for the "Mayors Cup Golf Tournament (Largo Wales). This was a campaign related email, sent to Ms. Wales' city email address.

In addition to clearly violating RCW 42.17A.555 by utilizing government issues cell phones for campaign use, Deputy Mayor Wales has additionally violated Auburn Municipal Code 2.92.010 which is the City Ethics Code. The City Ethics Code states "Public officials, both elected and appointed, comply with the laws and policies affecting the operations of government; Public office be used for the public good, not for personal gain." The code goes further under 2.92.030 which describes prohibited conduct which clearly talks about the above referenced RCW regulating the use of public office or agency facilities in campaigns.

2.92.060 of the Code states enforcement mechanisms for violation of the code. It reads "Enforcement of a violation of this ethics code against a councilmember shall be reviewed by an ad hoc committee comprised of three members of the city council, which ad hoc committee shall make a recommendation to the city council. The ad hoc committee shall be created for this purpose when called for by the deputy mayor, and members of such ad hoc committee shall be appointed by the deputy mayor; provided, that the mayor shall act to call for the ad hoc committee and appoint members to such ad hoc committee if the deputy mayor is disabled or precluded from acting in that capacity. Neither the councilmember about whom a complaint has been voiced, nor the councilmember who voiced the complaint, shall be appointed to the ad hoc committee or entitled to vote on any council action related to the complaint."

Clearly the Deputy Mayor would be precluded from calling an ad hoc committee to review her own violations of the law so we are formally requesting under the provisions of the Code of Ethics that the Mayor form this ad hoc committee to investigate the violations of City Code that have occurred. We additionally feel it would be inappropriate for Councilmember Trout-Manuel, a party to the violation, and Councilmember Peloza, Campaign manager for Deputy Mayor Wales, to be a part of this committee.

We also are requesting the ad hoc committee to review de minimis use policies governed by the state

and the local governing authority and how it applies to elected officials. In the web browsing history submitted by the City it is clear that Deputy Mayor Wales has visited MSN.com and the Weather over 999+ times each in the past 6 months. This is just one example of the Deputy Mayor's misuse of city resources, as we are certain further investigation into the Deputy Mayor's use of city issued devices would show far more abuse of city resources. We ask the committee if this constitutes de minimis use of government resources or if it is excessive.

It is also unclear, though probable, if during an unplanned stop to the Edgeview National Night Out on August 1, 2017, a city sponsored event, Ms. Wales was campaigning. On her Facebook she posted photos from the event, thanking her supporters, which would imply she had been. *RCW 42.17A.555*

On the electlargo.com website, and frequently on the Elect Largo for Auburn Mayor Facebook page, Ms. Wales has utilized her official City of Auburn photograph City Councilmember portrait for campaign purposes. This photo has a time stamp date of 6/6/2011 and clearly is older than 5 years old. While this may be also be a violation of RCW 42.17A.555 as Ms. Wales has again used official government resources to benefit her campaign, it is certainly a violation of *RCW 42.17A.330: Picture of candidate.*

Further, Ms. Wales continues to violate the law on her website, specifically, RCW 42.17A.320 which clearly states all materials must have sponsor identification such as a "Paid for by" line in their materials. The bottom of her website does not contain this disclaimer and it is unclear if she has paid for the site or another entity. This is not the only instance of the Elect Largo Wales campaign of failing to have sponsor identification on campaign material, as noted above. This shamelessly disrespects the public's right to this information.

We are also disturbed by actions taken by Largo Wales' campaign manager (Auburn Councilmember Bill Pelozo), and those in her campaign. In mid-September, a local minority owned restaurant, The Quarters, received a harassing phone call from the home of Mr. Pelozo, berating a staff member about Largo Wales' support of 5/7 council members and that because the owner of the restaurant has openly endorsed Ms. Wales' opponent, incumbent Mayor Backus, they will ensure none of their friends eat at the restaurant. Since that call the restaurant has received threatening and harassing phone calls, have had fake phone orders called in (and not picked up) and most recently feces were thrown onto the restaurant. Though all cannot be attributed to the Wales campaign, the attacks did not begin until the first call from Mrs. Pelozo. *Violation of RCW 29A.84.620*

Our final concern is that we fear Largo Wales and those working for her campaign are offering favors and promises in exchange for votes. The best example of this may be the interactions surrounding the Carpinito Brothers farm and the S 277<sup>th</sup> St project. On October 4, 2017 Elizabeth Miller submitted a records request to the city of Auburn for emails related to the S 277<sup>th</sup> St project and the Carpinito Brothers farm. This request produced emails between Mr. Mike Carpinito, Councilmember Bill Pelozo and Deputy Mayor Largo Wales. It also provided emails from staff members in the public works department relaying interactions they had with Councilmembers Pelozo and Wales. On October 2, 2017 Councilmember Pelozo interjected himself into a matter between a local business and the city's public works department. The business, The Carpinito Brothers, has endorsed Largo Wales in her bid for Mayor. *Likely violation of RCW 29A.84.620*

The Carpinito Brothers' farm is located off of a road that is being widened. Mike Carpinito reached out to Bill Peloza and Largo Wales, which lead to Bill Peloza speaking to a city staff member (in the Public Works dept.) on the phone while that staff member was at the Carpinito farm. Mr. Peloza informed the staff member to "take care of him, he's big business in Auburn."

At the October 2, 2017 City Council meeting Largo Wales raised the Carpinito issue twice, though it was stated it was being handled by the public works department. Despite this, and that public works had been on site on the 2nd, Ms. Wales personally went out to the Carpinito property, and from there repeatedly called city staff members. Ms. Wales also spoke to one of the City of Auburn attorneys, inquiring if she should advise Mr. Carpinito if he should get an injunction against the project.

This concerns us greatly. Is Ms. Wales using city resources to advise one of the business owners who have endorsed her? Does Mr. Peloza feel that a business out of Kent, whose owner lives in Kent, is more deserving of his attention because they endorsed the candidate who he is campaign manager for - and who promised to make him Deputy Mayor? We would hate to think that a Councilmember (let alone two) of our city had violated RCW §9A.68.040.

Ballots have dropped. Voting has started. We only hope that something can be done to ensure that if laws have been broken, the wheels of justice aren't too slow.

Sincerely,  
Elizabeth Miller  
Bailey Stober

### LARGO WALES, 2017

PERIOD	REPORT#	FILED	REPORT
10/12/2017 - 10/12/2017	100793655	10/17/2017	<del>C3</del>
10/11/2017 - 10/11/2017	100793652	10/17/2017	<del>C3</del>
10/10/2017 - 10/10/2017	100793664	10/17/2017	<del>C3</del>
10/10/2017 - 10/10/2017	100793661	10/17/2017	<del>C3</del>
10/05/2017 - 10/05/2017	100790858	10/08/2017	<del>C3</del>
10/02/2017 - 10/02/2017	100790860	10/08/2017	<del>C3</del>
09/26/2017 - 09/26/2017	100790863	10/08/2017	<del>C3</del>
09/15/2017 - 09/15/2017	100790866	10/08/2017	<del>C3</del>
09/11/2017 - 09/11/2017	100789353	09/29/2017	<del>C3</del>

## Who Will You Vote For?

**Dr. Largo Wales' Education & Training**  
 Washington State University - BA Education  
 University of Puget Sound - MA Administration  
 Seattle University - Doctorate Business & Leadership  
 Highline College - AA Paralegal  
 Columbia University - Post Doctorate Leadership  
 USA Fulbright Scholar

**Largo's Opponent:**  
 Green River College - AA  
 City University - BS in Bookkeeping

**Dr. Largo Wales' Prior Community Service**  
 Auburn Food Bank, President  
 Auburn Kiwanis, President  
 Auburn School Lunch Fund, Executive  
 ACAP, Executive Director  
 Auburn Head-Start  
 Auburn United Way as Chair  
 Auburn Youth Resources, President  
 Auburn School District, Special Education - 18 years  
 Auburn City Human Services  
 Auburn School Levies and Bond Issues

**Largo's Opponent:**  
 Miss Auburn  
 PTA

**Endorsed by 5 of the 7 Current Auburn City Councilmembers!**

ELECT **LARGO** Wales Auburn Mayor *Being Forward*  
 www.ElectLargo.com  
 lawales@comcast.net  
 facebook.com/ElectLargo

Paid for by the Committee to Elect Largo  
 11855 SE 288th Street  
 Auburn, WA 98002

EDDM RESIDENTIAL CUSTOMER

The choice is yours . . . Vote Dr. Largo Wales for Mayor . . . Moving Auburn Forward!

1.

## Come Meet Dr. Largo Wales "The Candidate" for Mayor

Lakeland Community Center  
 September 28, 2017 • 6:30 p.m. - 8:30 p.m.

### Let's Stand Together!

Make our Parks SAFE!  
 Get CRIME out of our Neighborhood!  
 STOP the massive tax increases and wasteful spending!  
 BRING more small businesses to Auburn!



## Lakeland, Let's Stand Together!



"Largo is passionate about the city of Auburn and its citizens. She listens and cares and then takes action." - **Kathy Lamar**, Civic Leader Lakeland

"I admire and respect Largo's passion for Auburn and its citizens. She is running for Mayor for no other reason than she wants what's best for this city." - **Darci Bidman**, Realtor Lakeland Specialist

"We need to be safe in our neighborhoods, our shopping centers, parks and library. We need to re-establish partnerships with all the people of Auburn and most of all all real transparency. For those who placed their trust in me and our great Councils I ask you to support Largo Wales." - **Pete Lewis**, Past Auburn Mayor

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EDDM RESIDENTIAL CUSTOMER


2.

3.


## Endorsed by 5 of the 7 Current Auburn City Co

"Her quick, hands-on, problem solving abilities are second to none." - **Rich Wagner**, Auburn City Councilmember

"I support Largo because the Council needs leadership!" - **Bill Pelazo**, Auburn City Councilmember



### RELATIONSHIPS MATTER!!!!



## Coming to a neighborhood near YOU!

### Thank You!

I have heard from Lakeland Voters and now we'll do what **West Hill Voters** say are their issues:

- Neighborhood Safety is paramount
- Keep Annexation promises
- Where is "our" centralized park?
- No to "Safe Injection Sites"
- New neighborhoods are not supported by roads and sidewalks


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COMMITTEE TO ELECT LARGO  
 11855 SE 288th Street  
 Auburn, WA 98002

PRESIDENT 8700 U.S. HIGHWAY 9000 SEATTLE, WA 98148 PERMIT #024776

\*\*\*\*\*CRW5H\*C 045  
 \*\*\*\*\* 5 P 6798



4.

5.

## Vote Largo Wales Mayor of Auburn in the Primary Election August 1<sup>st</sup> & General Election Nov 7<sup>th</sup>

"...moving Auburn forward," as Mayor

- Use existing City Budget wisely
- Re-create a vibrant DOWNTOWN
- Make parks and street clean/safe
- Repair roads and sidewalks
- Spend Auburn Budget in AUBURN

ELECT **LARGO** Wales Auburn Mayor *Being Forward*



## Coming to a neighborhood near YOU!

### Thank You Lakeland Voters!!!

"I have doorbelled your homes and here are your ISSUES," - **Largo Wales** for Mayor

- Prioritize neighborhood SAFETY
- Make something happen DOWNTOWN
- Reduce homelessness & its IMPACTS
- Advocate for Auburn & less regional work
- Clean & make Safe our PARKS

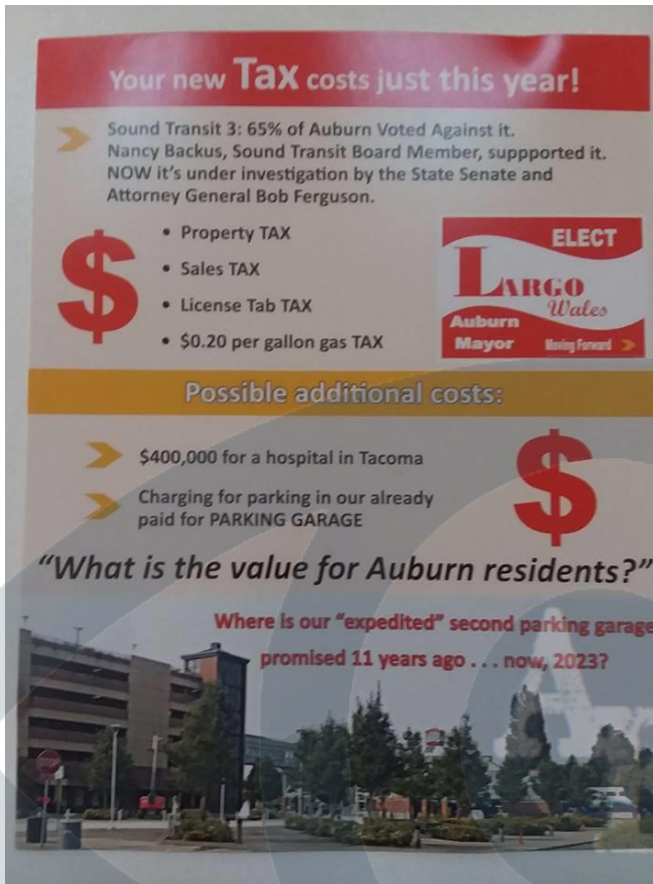
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6.



http://www.electlargo.com/: No paid for notation – violation of RCW 42.17A.320: Identification of sponsor



Facebook sponsored ad





No paid for notation – violation of RCW 42.17A.320: Identification of sponsor

Elect Largo for Aubu...  ...

HOME ABOUT VIDEOS POSTS EVENTS

 Album Kick off ...

 **Elect Largo for Auburn Mayor** added 5 new photos.  
Mar 1 at 6:35pm · 

Thank you to everyone who made it out, it was a great night and I am so happy to see all of you.



 5

 Share

Elect Largo for Aubu...  ...

HOME ABOUT VIDEOS POSTS EVENTS

 **Elect Largo for Auburn Mayor**  
Mar 20 at 9:11pm · 

My first coffee hour and endorsements went great!



 Like  Comment  Share

Verizon 9:29 AM   


 **Elect Largo for Auburn Mayor**  
41 mins · 

We had a great open house at Lakeland, filled the seats and had hardy discussions. Thank you to those who attended and if you need more signs, please call 253 737-5553!





 Like  Comment  Share

Elect Largo for Aubu...  ...


HOME ABOUT VIDEOS POSTS EVENTS

 **Elect Largo for Auburn Mayor** shared their event.  
Jun 21 at 1:49pm · 

Tomorrow at 6:30 PM., come to the Sunbreak Cafe and tell me what you want to see get done for your city!


We will also have the event go Facebook Live, so ask your questions via FB and say hello!


I look forward to seeing you guys tomorrow!



THU, JUN 22  
**Come Meet Largo**  
The Sun Break Cafe · Auburn

 INTERESTED

 You've visited The Sun Break Cafe

 5

 Share

**From:** Auburn Wine and Caviar Company <shop@auburnwineandcaviar.com>  
**Sent:** Tuesday, July 25, 2017 8:43 AM  
**To:** Auburn Wine and Caviar Company  
**Subject:** End of July 6

**Quick Month.....**At least we got some sun.....Cannot believe next week is August already.....

**Tuesday's Italian dinners** are going strong.....Come down and enjoy.....

**Wednesday** is still "Half-Price Night" for all of our "House Wines".....Great night to relax.....

**Friday night** we are having a "**Cab Franc**" tasting.....**Stephanie** from Youngs Distribution will be here to tell you everything about "Cab Franc".....

**Jeff Mimms** will also be here on Friday night with **Great, Great Music....**

**Saturday night** is "**Largo for Mayor**" night.....If you are going to vote for Largo you will get **50% off your first glass of wine.....**Don't forget to **VOTE** on Tuesday

**Have a GREAT Week**

**Wait, wait, wait....**There is more.....

**Aug 10th** we are going to have **(at last)** our 1st **Cigar and Scotch Pairing.....**Learn about **Cigars and Scotch** on the same night.....We make it easy for you....

**Ok...Now go have a GREAT Week**

**Elect Largo for Auburn Mayor** added 4 new photos – with **Largo Wales**.  
Jul 5 at 12:00pm · 🌐

It was fantastic to see our Les Grove Park thrive with such active members within and outside the community! I promise to you I want to continue to help the city thrive hence why I vow to #MoveAuburnForward!

#ElectLargo #ElectLargoForAuburnMayor



👍🗨️ Elect Largo for Auburn Mayor and 19 others 1 Share

**Elect Largo for Auburn Mayor** is at **Les Grove Park**.  
Apr 22 at 10:00am · 🌐

2017 Auburn Clean Sweep and my Elect Largo work crew...we had a great time and got a lot of work done (planted 60 bushes at the Events Center).



👍 11

🔗 Share



 **Elect Largo for Auburn Mayor** added 2 new photos – with **Largo Wales**.  
Aug 7 at 9:32am · 🌐

Thank you all once again for your support! I had a fantastic time meeting you all at national night out!

**#ElectLargoForMayor #MovingAuburnForward**



👍 23      1 Share



Edgeview National Night Out photos and Facebook post

www.auburnwa.gov/governr

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**AUBURN**  
WASHINGTON

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## Largo Wales



Dr. Largo Wales began her term to the Auburn City Council in 2012. She serves on Pierce County Cities & Towns, Pierce County Regional Council, Tacoma-Pierce County Board of Health, King County Board of Health, Seattle King County Board of Health Environmental Health Fees, and the King County Solid Waste Advisory Committee (SWAC).

A lifelong learner and educator, she holds a Bachelor of Arts from Washington State University, a Master of Arts from the University of Puget Sound, a Doctorate from

www.electlargo.com/about/

LARGO WALES



## Largo

Though different shots, these photos are clearly from the same photoshoot based on the clothing, earring, necklace and backdrop. As this has been the only candidate photo released of Ms. Wales, this is in violation of RCW 42.17A.330: Picture of candidate.