SMITH & LOWNEY, P.L.L.C.

2317 E. JOHN ST. SEATTLE, WASHINGTON 98122 (206) 860-2976, FAX (206) 860-4187

September 13, 2016

Robert Ferguson Washington State Attorney General 1125 Washington St SE PO Box 40100 Olympia, WA 98504-0100

Daniel Satterberg King County Prosecuting Attorney W554 King County Courthouse 516 Third Avenue Seattle, WA 98104

Re: 1st Notice of Intent to Sue for Violations of RCW 42.17A

Dear elected officials:

We represent Washingtonians for Ethical Government ("Washingtonians") in submitting this statutory notice of intent to sue.

Washingtonians have reason to believe that Tim Eyman, Jack Fagan, Mike Fagan, Barbara Smith, and We Love Our Cars – VMWC – 2017 (collectively "Eyman") have violated RCW chapter 42.17A.

Washingtonians intend to bring a citizens' action against Eyman under RCW 42.17A.765(4) if you do not commence an action against Eyman within the following notice periods specified by statute. At the expiration of 45 days from the date of this letter, a second notice of intent to sue will be sent to you if you have not yet filed suit against Eyman. If after 10 days following receipt of the second notice you still have not filed suit against Eyman, Washingtonians will bring an action in Superior Court.

I. Violations of RCW 42.17A.

The basis for Washingtonians' belief that Eyman violated certain sections of RCW Chapter 42.17A is described in the attached complaint form and incorporated herein by reference. Indisputable evidence shows Eyman intentionally violated our campaign laws.

II. Tim Eyman is a Serial Violator of RCW 42.17A.

Eyman's latest violations are part of a long history of Tim Eyman's disregard for our state's campaign finance laws. Eyman already has three strikes against him, and the current violations are the fifth. He should not be given another pass.

Eyman 45 Day Notice Letter September 13, 2016 Page 2

Strike One: In 2002, Eyman was required to pay \$50,000 in penalties and was barred from serving as a treasurer or having control over a political committee's financial accounts, based upon evidence tending to show that Eyman deceived contributors, embezzled funds from his campaign organization, and failed to properly report the committee's expenditures. For specific evidence and details, see PDC Case No. 02-281.

Strike Two: In 20004, fines were assessed against three of Tim Eyman's political committees. *See* PDC Case No. 05-066 and 05-068.

Strike Three: Not long ago, the PDC found again that Eyman used campaign funds for personal use and illegally used funds raised for one initiative to support a different initiative. The PDC found evidence of illegal concealment because the "expenditures were described in the committee's report as paying for I-1185 signatures, but were intended in part to result in compensation for Mr. Eyman." The PDC found multiple violations of the law and the matter is currently being prosecuted by the Attorney General.

Strike Four: In May, we sent a 45-day notice letter to you which outlined additional violations. Based upon that notice, the PDC recommended that the Attorney General bring another lawsuit against Eyman for multiple apparent violations of RCW 42.17A.205, RCW 42.17A.240, and RCW 42.17A.320. An investigation by PDC staff found that the Eyman-controlled committee Bring Back Our \$30 Car Tabs failed to report an independent expenditure opposing candidates for the Washington State Legislature in a complete and timely manner, failed to amend the committee's registration with updated information as the law requires, and failed to provide complete and accurate sponsor identification and list of top five contributors in its advertising. *See* PDC Case No. 5729.

Tim Eyman has again and again shown a complete and utter disregard for our campaign finance laws and must be prosecuted to the full extent of the law.

III. Penalty Demand.

All of the persons and entities described in this letter should pay a penalty for their part is this concealment.

Washingtonians intend to sue for all violations, including those yet to be uncovered and those committed subsequent to the date of this notice of intent to sue. Washingtonians believe that this Notice sufficiently states grounds for filing suit. We intend, at the close of the notice periods, or shortly thereafter, to file a citizen's action against the above-named persons and entities under RCW 42.17A.765(4) for violations of the Fair Campaign Practices Act, RCW Chapter 42.17A. If you have any questions or concerns regarding this Notice, please contact the undersigned attorney.

Eyman 45 Day Notice Letter September 13, 2016 Page 3

Very Truly Yours,

SMITH & LOWNEY, PLLC

Knoll Lowney

2317 E. John, Seattle, WA 98112

Attorneys for Washingtonians for Ethical Government

Washingtonians for Ethical Government

2137 E John | Seattle, WA 98112

Complaint Against "We Love Our Cars – VWMC – 2017" for Violations of RCW 42.17A

I. Respondents

We Love Our Cars – VMWC – 2017 PO Box 18250, Spokane, WA 99228

Phone: 509-991-5295

Tim Eyman, Officer/Media Contact 11913 59th Ave W, Mukilteo, WA 98275

Phone: 425-493-9127; email: tim_eyman@comcast.net

Jack Fagan, Officer/Manager 7020 N Wall Street, Spokane, WA 99208

Phone: 509-991-4762; email: jakatak@comcast.net

Mike Fagan, Officer 1523 E Dalton Street, Spokane, WA 99207

Barbara Smith, Treasurer PO Box 1093, Mead, WA 99021

Phone: 509-435-2160

II. Alleged Violations

On June 1st, 2016, Respondent officers formed a political committee called "We Love Our Cars – VMWC – 2017" (hereafter WLOC), a ballot committee with the stated purpose of supporting Initiative 869, an initiative to the 2017 Washington State Legislature (see Exhibit A). On July 11th, 2016, Respondents filed the committee's first C4 and C3 reports; an amended C4 was subsequently filed on July 13th, 2016.

The amended C4 filed on July 13th, 2016 (see Exhibit B) states that the committee had previous total cash and in kind contributions of \$143,947.61, and received \$6,274.38 in cash for the month of June, for a total of \$150,221,99. No in kind contributions, loans, or pledges were reported.

However, this amended C4 was the very first C4 filed by the campaign – it could not have had any previous cash or in-kind contributions because it had only just been formed.

WLOC has reported raising a total of \$154,854.71 to date. The vast majority of this sum – \$143,947.61, or ninety-two percent of the total – is unaccounted for. The law requires that committees report *all* of their contributions so that the public can **follow the money**. By concealing the source of WLOC's seed money, which constitutes over ninety percent of the total raised since its formation, WLOC and its officers are committing an egregious act of concealment. Months have transpired since the filing of the aforementioned reports, but Respondents have not disclosed where the \$143,947.61 came from. Respondents have failed to comply with the reporting requirements of Chapter 42.17A RCW, and must be held accountable.

Washingtonians for Ethical Government

2137 E John | Seattle, WA 98112

III. Evidence

Reports filed with the Public Disclosure Commission

- Exhibit A: C1PC for WLOC, filed June 1st, 2016
- Exhibit B: Amended C4 for the month of June 2016 for WLOC, filed July 11th, 2016
- Exhibit C: Amended C4 for the month of July 2016 for WLOC, filed August 10th, 2016

IV. Witnesses

Persons with firsthand knowledge of WLOC's activities are its officers: Tim Eyman, Jack Fagan, Mike Fagan, and Barbara Smith (Treasurer). Addresses are listed in Part 1.



Political Committee Registration

C1PC 100698112

| (360) 753-1111 Toll Free 1-877-601-2828 | . iogiotiati | | | (1/12) | 06- | -01-2 | 016 |
|---|---|---|--|----------------------|-------------------------------------|--------------------|--------------|
| Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) WE LOVE OUR CARS - VWMC - 2017 | | | Acr | Acronym: LV CARS | | | |
| | | | Tele | ephone: 509- | 991-5295 | | |
| Mailing Address | | | | | | | |
| PO BOX 18250 | | | Fax | : 509- | 467-4323 | | |
| City | County | Zip | + 4 | | | | |
| SPOKANE | SPOKANE | 99 | 228 E-m | nail: JAKATA | K@COMCAST | .NET | |
| NEW OR AMENDED REGISTRATION? | | EE STATUS | | 011111111 | 110 0 0110110 1 | • | |
| ☑ NEW. Complete entire form.☐ AMENDS previous report. Complete entire form | | | | | | | |
| 1. What is the purpose or description of the committee | ? | , | | | | | |
| ☐ Bona Fide Political Party Committee - official st of the names of the candidates you support. | ate or county central com | mittee or legislativ | e district committee. If you | are not supporti | ng the entire party | ticket, a | ttach a list |
| ■ Ballot Committee - Initiative, Bond, Levy, Recall, LIMIT TAXES, FEES, TOOLS E | · · | | e: | | Ballot Number 869 | FOR | AGAINST |
| Other Political Committee - PAC, caucus comm name: | ittee, political club, etc. If | committee is rela | ted or affiliated with a busir | ess, association | , union or similar e | entity, spe | ecify |
| For single election-year only committees (not cont (a) one or more candidates? Yes No | | | oporting or opposing ne, office sought and politica | al party affiliation | | | |
| (b) the entire ticket of a political party? | ■ No If yes, identif | fy the party: | | | | | |
| 2. Related or affiliated committees. List name, address | ss and relationship. | | | | | | |
| HELP US HELP TAXPAYERS, AFFI 3. How much do you plan to spend during this entire educing the below. (If your committee status is continuing, estimate the status is continuing). | election campaign, includi | ng the primary and | | | Continue, choose one of the | | |
| If no box is checked you are obligated to use | Full Reporting. See inst | truction manuals | for information about rep | oorts required a | nd changing rep | orting op | tions. |
| MINI REPORTING Mini Reporting is selected. No more than than \$500 in the aggregate will be accepted. | | | FULL REPORTIN Full Reporting is a mandated by law | selected. The fre | equent, detailed ca equired. | ımpaign r | eports |
| 4. Campaign Manager's or Media Contact's Name and JACK FAGAN - MANAGER - TIM PO BOX 18250, SPOKANE WA 992 | EYMAN - MEDIA | CONTACT | | I . | phone Number: 19-991-529 | 5 | |
| 5. Treasurer's Name and Address. Does treasurer penet page for details. List deputy treasurers on atta BARBARA J SMITH PO BOX 1093, MEAD WA 99021 | erform <u>only</u> ministerial fund ached sheet. | ctions? Yes X | No See WAC 390-05- | | time Telephone N 19-435-216 | | |
| Persons who perform only ministerial functions on to persons. See WAC 390-05-243 and next page for the persons. | | <u>nd</u> on behalf of ca | ndidates or other political c | ommittees. List r | name, title, and ad Continued on | | |
| 7. Committee Officers and other persons who authorize | e expenditures or make o | decisions for comm | mittee. List name, title, and | address. See n | ext page for defini | tion of "o | fficer." |
| TIM EYMAN, OFFICER, 11913 59 JACK FAGAN, OFFICER, 7020 N MIKE FAGAN, OFFICER, 1523 E | TH AVE W, MUK WALL ST, SPOK | ILTEO WA 9 ANE WA 992 | 99275 208 | | Continued on | | |
| 8. Campaign Bank or Depository | | Bra | nch | Cit | ty | | |
| BANK OF AMERICA | | 30 | E WELLESLEY | SP | OKANE | | |
| Campaign books must be open to the public by app holidays. In the space below, provide contact infor post office box or an out-of-area address. | | | | | | | |
| Street Address, Room Number, City | where campaign books | will be available | e for inspection | | | | |
| 7020 N WALL ST, SPOKANE | | /EOO\/ | 001 4760 (500) | 167 1000 | T 7 TZ 7 TP 7 TZ ^ ~ | ~ ~ ~ ~ | T NITTER |
| In order to make an appointment, contact the camp | | | | | | | |
| 10. Eligibility to Give to Political Committees and must receive \$10 or more each from ten Wa contributing to a Washington State political comm prior to making a contribution to a state office | shington State registered nittee. Additionally, during e candidate your commi | d voters before g the six months ttee must have | 11. Signature and Certif and correct to the best of Committee Treasu | my knowledge. | | nt is true, Dat | · |
| received contributions of \$10 or more each from voters. | at least ten Washington | State registered | BARBARA J SMI | TH | | 06-01 | -2016 |
| ☑ A check here indicates your awareness of and Absence of a check mark means your committe State political committees and/or state office cand | e does not qualify to give | | | | | | |



SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE

100707151

07-11-2016

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

WE LOVE OUR CARS - VWMC - 2017 Mailing Address City PO BOX 18250 SPOKANE, WA Office Sought (Candidates) Zip + 4Election Date *For PACs, Parties & Caucus Committees: During 99228 2017 this report period, did the committee make an independent From (last C-4) To (end of period) Report Period Final Report? expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate? Covered 06/30/16 06/01/16 Yes No X **RECEIPTS** *See next page Yes No 1. Previous total cash and in kind contributions (From line 8, last C-4) In kind contributions received (From line 1, Schedule B)..... Total cash and in kind contributions received this period (Line 2 plus 3)...... 6,274.38 Loan principal repayments made (From line 2, Schedule L)..... Corrections (From line 1 or 3, Schedule C)......Show + or (-) 0.00 Total pledge payments due (From line 2, Schedule B) 0.00 **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) 0.00 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)..... 4,425,17 14. Loan principal repayments made (From line 2, Schedule L)..... 0.00 17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... **CANDIDATES ONLY** Name not **CASH SUMMARY** 18. Cash on hand (Line 8 minus line 17)......______ Won Lost Unopposed on ballot [Line 18 should equal your bank account balance(s) plus your petty cash balance.] Primary election 19. Liabilities: (Sum of loans and debts owed) General election Treasurer's Daytime Telephone No.: 20. Balance (Surplus or deficit) (Line 18 minus line 19) (509)435-2160145,796.82 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 Treasurer's Signature BARBARA J SMITH

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

(11/93)

2

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

Report Date

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 |
|-----------------|----------|-----------------|--------|-----------------|--------|----------------|
| 06/28/2016 | 1,476.66 | 06/16/2016 | 5.63 | | | |
| 06/28/2016 | 265.00 | | | | | |
| 06/29/2016 | 4,527.09 | | | | | |
| | | • | | | | Φ. |

2. TOTAL CASH RECEIPTS Enter also on line 2 of C4 \$ 6,274.

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 <u>in-kind or earmarked contributions</u> to a candidate or committee or <u>independent expenditures</u> 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 on an attached sheet: 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

\$

4,425.17

Enter also on line 11 of C4

3. EXPENDITURES

4. TOTAL CASH 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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 | |
| 06/03/16 | EMPS P O BOX 6600 HAGERSTOWN, MD 21740 | | CREDIT CARD CHARGES | 40.76 |
| 06/08/16 | ADPRO LITHO INC 11012 MUKILTEO SPEEDWAY MUKILTEO, WA 98275 | | PRINTING | 427.14 |
| 06/09/16 | RUNTIME 12318 N MAIN STREET MEAD, WA 99021 | | WEBMASTER | 100.00 |
| 06/16/16 | U S BANK P O BOX 790179 ST LOUIS, MO 63179 | | PAYMENT OF INTEREST ON TIM EYMAN LOAN | 681.35 |
| 06/23/16 | JANET FAGAN 2402 N ADDISON STREET SPOKANE, WA 99207 | | DATA ENTRY | 1,320.00 |
| 06/27/16 | BANK OF AMERICA P O BOX 25118 TAMPA, FL 33622 | | WIRE TRANSFER AND CASHIERS CHECK FEE | 53.00 |
| | | ' | Total from attached pages | \$ 1,802.92 |

EXPENDITURES CONTINUATION SHEET (Attachment to Schedule A)

Page 3

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

Report Date

06/01/16

06/30/16

| Date Paid | Vendor or Recipient (Name and Address) | Code | Purpose of Expense and/or Description | Amount |
|-----------|---|------|---------------------------------------|----------|
| 06/28/16 | PAY PAL 2221 N 1ST STREET SAN JOSE, CA 95131 | | PAY PAL FEES | 53.68 |
| 06/28/16 | STEPHENS & KLINGE LLP 10900 NE 8TH STREET SUITE 1325 BELLEVUE, WA 98004 | | LEGAL EXPENSES | 1,366.10 |
| 06/29/16 | EMPS P O BOX 6600 HAGERSTOWN, MD 21740 | | CREDIT CARD CHARGES | 7.74 |
| 06/29/16 | VERIZON P O BOX 4005 ACWORTH, GA 30101 | | TELEPHONE CHARGES | 375.40 |
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SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

C4(3/97)

PDC OFFICE USE

100715247

08-10-2016

(360) 753-1111 EXPENDITURES

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

WE LOVE OUR CARS - VWMC - 2017 Mailing Address City PO BOX 18250 SPOKANE, WA Office Sought (Candidates) Zip + 4Election Date *For PACs, Parties & Caucus Committees: During 99228 2017 this report period, did the committee make an independent From (last C-4) To (end of period) Report Period Final Report? expenditure (i.e., an expense not considered a contribution) supporting or opposing a state or local candidate? Covered 07/31/16 07/01/16 Yes No X **RECEIPTS** *See next page Yes No 1. Previous total cash and in kind contributions (From line 8, last C-4) In kind contributions received (From line 1, Schedule B)..... Total cash and in kind contributions received this period (Line 2 plus 3)..... 4,632.72 Loan principal repayments made (From line 2, Schedule L)..... Corrections (From line 1 or 3, Schedule C)......Show + or (-) 0.00 Total pledge payments due (From line 2, Schedule B) 0.00 **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) 4,425.17 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)..... 2,384,53 14. Loan principal repayments made (From line 2, Schedule L)..... 0.00 17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)..... 6,809,70 **CANDIDATES ONLY** Name not **CASH SUMMARY** 18. Cash on hand (Line 8 minus line 17)......______ Won Lost Unopposed on ballot [Line 18 should equal your bank account balance(s) plus your petty cash balance.] Primary election 19. Liabilities: (Sum of loans and debts owed) General election Treasurer's Daytime Telephone No.: 20. Balance (Surplus or deficit) (Line 18 minus line 19) (509)435-2160148,045.01 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 Treasurer's Signature BARBARA J SMITH

CASH RECEIPTS AND EXPENDITURE

SCHEDULE to C4

| A | |
|---------|--|
| (11/93) | |

2

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

Report Date

| | | | | | 07/01/16 | 07/31/16 |
|---|----------|-----------------|--------|-----------------|----------|----------------|
| 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 |
| 07/15/2016 | 2,439.72 | | | | | |
| 07/25/2016 | 2,193.00 | | | | | |
| | | | | | | |

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$

4,632.72

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 <u>in-kind or earmarked contributions</u> to a candidate or committee or <u>independent expenditures</u> 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 on an attached sheet: 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 or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting 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 | |
| 07/05/16 | EMPS P O BOX 6600 HAGERSTOWN, MD 21740 | | CREDIT CARD CHARGES | 38.19 |
| 07/12/16 | RUNTIME 12318 N MAIN STREET MEAD, WA 99021 | | WEBMASTER | 100.00 |
| 07/14/16 | VERIZON P O BOX 4005 ACWORTH, GA 30101 | | TELEPHONE CHARGES | 708.84 |
| 07/20/16 | BARBARA DASE 13241 22ND AVENUE S SEATAC, WA 98168 | | TYPESETTING | 112.50 |
| 07/27/16 | JANET FAGAN 2402 N ADDISON STREET SPOKANE, WA 99207 | | DATA ENTRY | 1,425.00 |
| | | | | |

Total from attached pages

3

Enter also on line 11 of C4

2,384.53

0.00