

Executive Summary and Staff Analysis
Washington State Association for Justice (WSAJ),
Gerhard Letzing, and Suone Cotner
(45-Day Citizen Action Complaint)
PDC Case No. 2863

This summary highlights staff's findings, conclusions, and recommendations regarding the allegations contained in PDC Case No. 2863, a 45-Day Citizen Action Complaint (Complaint) filed on January 25, 2016 by David Dewhirst and James Abernathy of the Freedom Foundation against the Washington State Association for Justice (hereafter, WSAJ), and Gerhard Letzing and Suone Cotner, WSAJ Executive Director and Deputy Director.

Background

The Attorney General's Office referred the Complaint to the PDC on February 10, 2016 for investigation and possible action. On February 12, 2016, PDC staff sent a letter to WSAJ through its Executive Director Gerhard Letzing, informing the respondents that staff had opened a formal investigation, and requesting a written response. On February 25, 2016, Dmitri Iglitzin, counsel to WSAJ and WSAJ staff, provided a response to the allegations.

Allegations

The Complaint alleged that as the employer of registered Washington State lobbyists, WSAJ violated RCW 42.17A.630 by failing to file required special reports disclosing the association's monetary and in-kind contributions to candidates, elected officials, officers and political committees, alleged violations of RCW 42.17A.630(2)¹.

Investigative Findings and Conclusion

Based on the factors identified in the investigation, staff found and concluded as follows:

During the period reviewed by staff, various political committees, including WSAJ's own political committee Washington State Association for Justice - Justice for All PAC (WSAJ PAC), reimbursed WSAJ for administrative fees and professional services. PDC staff found no evidence that these payments to WSAJ indicated that WSAJ made in-kind contributions to political committees as alleged in the Complaint, and failed to report these contributions as a lobbyist employer. Rather, staff found that the political committees' payments to WSAJ constituted payments for services rendered to the committees.

Staff's findings indicate that WSAJ, as a lobbyist employer, did violate RCW 42.17A.630(2) by failing to file special L-3c reports of monetary contributions to political committees totaling \$81,872.20, when the contributions were not disclosed by WSAJ's registered lobbyists. The reports were due on two occasions in 2012, and were not filed.

¹ For periods prior to January 1, 2012, RCW 42.17A.630 was codified as RCW 42.17.180.

In addition, staff's findings indicate that a \$70,000 contribution by WSAJ to Our Washington PAC, made on or around October 12, 2012, was not disclosed on the annual L-3 report WSAJ filed as a lobbyist employer on February 28, 2013, indicating a violation of RCW 42.17A.630(1). At the time WSAJ made this contribution to Our Washington PAC, the latter was sponsoring Independent Expenditure political advertising and Electioneering Communications in opposition to the 2012 Rob McKenna Campaign for Governor.

Other unreported monetary contributions by WSAJ, including a \$500,000 monetary loan to the Stop the Insurance Industry Takeover Committee (No on I-1082), were required to be disclosed on L-3 and L-3c reports due outside the five-year limitation on state actions in RCW 42.17A.770.

Recommendation

For the reasons described above, staff recommends that the Commission find multiple apparent violations of RCW 42.17A.630(1) and (2) and recommend to the Attorney General to take appropriate action concerning WSAJ's apparent failure to disclose all of its reportable contributions on L-3 and L-3c reports during the five-year period of March 2011 through February 2016.



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

IN RE COMPLIANCE)	PDC CASE NO: 2863
WITH RCW 42.17A)	
)	
Washington State Association for)	
Justice (WSAJ); WSAJ Executive Director)	REPORT OF INVESTIGATION
Gerhard Letzing; and WSAJ Deputy)	
Director Suone Cotner)	
)	
Respondents.)	
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I.

BACKGROUND

- 1.1 The Washington State Association for Justice (hereafter WSAJ) was originally formed in 1953 as the National Association of Claimants Compensation Attorneys (NACCA); in 1967 became the Washington State Trial Lawyers Association (WSTLA); and in 2008 became the Washington State Association for Justice (WSAJ). WSAJ is a member association made up of approximately 2500 attorneys and staff. The Web site of the WSAJ is www.washingtonjustice.org, which describes WSAJ as being committed exclusively to the needs of plaintiff's attorneys and a proven voice for injured people in Washington courtrooms.
- 1.2 On January 25, 2016, David Dewhirst and James Abernathy of the Freedom Foundation filed a 45-Day Citizen Action Notice with the Washington Attorney General and Thurston County Prosecutor, alleging violations of RCW 42.17A by WSAJ, Gerhard Letzing, and Suone Cotner (respectively, WSAJ Executive Director and Deputy Director). (**Exhibit 1.**) The Citizen Action Notice alleged that as a lobbyist employer, WSAJ made in-kind and monetary contributions without properly reporting to the PDC, alleged violations of RCW 42.17A.630(2)(a).
- 1.3 On February 10, 2016, the Washington State Attorney General's office forwarded Mr. Dewhirst and Mr. Abernathy's Notice to PDC staff with a request for review and possible investigation.

II.

ALLEGATIONS IN COMPLAINT

- 2.1 First allegation: WSAJ, as a lobbyist employer, violated RCW 42.17A.630 by failing to file required reports detailing its monetary and in-kind contributions to candidates, elected officials, officers and political committees. Based on C-3 reports filed by political committees and candidates from 2010 to present, the complaint alleged that WSAJ contributed as least \$160,984 to candidates and political committees without reporting any of the monetary contributions on any L-3c or L-2 reports.
- 2.2 Second allegation: Washington State Association for Justice Justice for All PAC (WSAJ PAC), WSAJ's own political committee, reimbursed WSAJ for administrative fees and professional services. The complaint alleged that these payments to WSAJ indicated that WSAJ made in-kind contributions to WSAJ's political committee, and failed to report these contributions as a lobbyist employer, additional alleged violations of RCW 42.17A.630.
- 2.3 Third allegation: Between the period of 2010 and the present, other political committees reported reimbursements to WSAJ for alleged in-kind contributions and a \$500,000 monetary loan. The complaint alleged that WSAJ failed to report approximately \$1,467,387 in in-kind contributions and a monetary loan to the PDC over a five-year period, additional alleged violations of RCW 42.17A.630.

III.

FINDINGS

PDC Staff Review of WSAJ Contributions and Reporting

- 3.1 On February 25, 2016, a response to the Notice was received from Dmitri Iglitzin, legal counsel to WSAJ. (**Exhibit 2.**) Staff reviewed information in that response; information in campaign finance reports and data filed with the PDC by WSAJ, by PACs affiliated with WSAJ, and unaffiliated candidate and political committees. PDC staff assessed WSAJ's reportable contributions during the five-year period of the PDC's statute of limitations, RCW 42.17A.770.
- 3.2 Although the Notice alleged expenditures by WSAJ totaling \$1,467,387 from 2010 to the present day for monetary and in-kind contributions to candidates and political committees, including a \$500,000 loan, special reports of any contributions that were due prior to March 2011 fall outside the five-year statute of limitations. In particular, a \$500,000 monetary loan by WSAJ to the Stop the Insurance Industry Takeover committee in opposition to 2010 Initiative 1082 was made on or around October 8,

2010. **(Exhibit 3.)** An L-3c report disclosing this contribution would have been required in November of 2010, more than five years before the date of this report.

- 3.3 Staff's initial review of reports and data on file with the PDC indicated that between February 1, 2011 and March 1, 2016, WSAJ used general treasury funds to make approximately \$123,997.60 in contributions to candidates and political committees. **(Exhibit 4.)** The amount attributed to WSAJ consisted of monetary contributions to a WSAJ-affiliated political committee (WSAJ-Justice in Action PAC), the committee Our Washington PAC, and three candidates' campaigns.
- 3.4 On February 29, 2016, PDC staff received an email from Dmitri Iglitzin sent on behalf of WSAJ, clarifying that three contributions totaling \$2,800 that were attributed to WSAJ in reports filed by candidates James Gizzi, Pramila Jayapal, and Robert McCaslin were not, in fact, made from the general treasury of WSAJ. Rather, Mr. Iglitzin stated that the contributions were made from the PAC funds of WSAJ Justice for All PAC, and were misattributed by the recipients. **(Exhibit 5.)** PDC staff reviewed contemporaneous reports filed by Justice for All PAC, and saw that the committee did disclose making the three contributions to the candidates. Because the candidate contributions were not made by WSAJ, they were not required to be disclosed by WSAJ on L-3c reports.
- 3.5 On March 7, 2016, PDC staff received an additional email from Mr. Iglitzin, clarifying that three contributions totaling \$39,324.80 that were attributed to WSAJ in reports filed by WSAJ Justice in Action PAC were not, in fact, made from the general treasury of WSAJ. Rather, Mr. Iglitzin stated that the contributions were made from the PAC funds of WSAJ Justice for All PAC, and were misattributed by Justice in Action PAC. **(Exhibit 6.)** PDC staff reviewed contemporaneous reports filed by Justice for All PAC, and saw that the committee did disclose making the contributions to Justice in Action PAC. Because the contributions were not made by WSAJ, they were not required to be disclosed by WSAJ on L-3c reports.
- 3.6 With these adjustments, staff's review indicates that within the five-year statute of limitations, WSAJ made two contributions totaling \$81,872.20 from general treasury funds¹. The first of these contributions was a \$11,872.20 contribution to WSAJ Justice in Action PAC made on or around January 10, 2012, and the second was a \$70,000 contribution to Our Washington PAC made on or around October 12, 2012.

¹ On February 17, 2016, following the date of the Citizen Action Notice, WSAJ filed an L-3c report disclosing \$78,575.42 in contributions made to WSAJ Justice For All PAC on January 11, 2016, ostensibly from the general treasury of WSAJ. However, on March 2, 2016, Mr. Iglitzin contacted PDC staff to clarify that this total of contributions was in fact attributable to numerous individual members of WSAJ, and not to the association itself. The names of these individual contributors were first disclosed by WSAJ Justice For All PAC on a C-3 monetary contributions report filed one week before the WSAJ L-3c report. Because the contributions came from the personal funds of a number of individuals rather than from the general treasury of WSAJ, the L-3c report filed on February 17, 2016 was not required.

3.7 During the five-year period reviewed by staff, five individuals were registered with the PDC to lobby on behalf of WSAJ. The individuals were as follows:

1. Elizabeth Berry
2. Lindsey Grad
3. Larry Shannon
4. Michael Temple
5. Anita Yandle

Staff reviewed monthly L-2 Lobbyist Expense Reports filed by these five lobbyists, and saw that only Mr. Shannon and Mr. Temple disclosed contributions to any candidate or political committee on form L-2. Without exception, the contributions disclosed were from the personal funds of the lobbyist. None of the lobbyists' L-2 reports disclosed contributions on behalf of their employer, WSAJ.

3.8 Considering the contribution activity discussed above, it appears WSAJ failed to file L-3c reports disclosing \$81,872.20 in contributions made in 2012, when those contributions were not disclosed by the association's registered lobbyists. It appears that L-3c reports were not filed as required on two occasions after WSAJ exceeded the monthly reporting threshold².

3.9 In addition, PDC staff's review indicates that WSAJ's \$70,000 contribution to Our Washington PAC, made on or around October 12, 2012, was not disclosed on the annual L-3 report WSAJ filed as a lobbyist employer on February 28, 2013 for calendar year 2012. **(Exhibit 7.)** At the time WSAJ made this contribution to Our Washington PAC, the latter was sponsoring Independent Expenditure political advertising and Electioneering Communications in opposition to the 2012 Rob McKenna Campaign for Governor. **(Exhibit 8.)**

² This threshold was more than \$100 in aggregate monthly contributions until December 1, 2014, when it was adjusted to \$110. WAC 390-20-150.

Response by WSAJ to Citizen Action Notice

3.10 In his February 25, 2016 response to the Notice, Mr. Iglitzin addressed the allegations concerning WSAJ's failure to disclose contributions made by a lobbyist employer. He stated:

- “[Freedom Foundation] asserts that WSAJ ‘made substantial, unreported in-kind contributions’ to its own continuing political committee, WSAJ PAC. It bases this claim on evidence that ‘[f]rom 2012 to the present, WSAJ PAC reimbursed WSAJ at least \$636,310 for its in-kind contributions to WSAJ PAC.’ ”
- “[Freedom Foundation] misunderstands its own asserted evidence. The ‘Schedule A’ forms submitted by WSAJ PAC along with that PAC’s C4 filings plainly show that all of the money which was reported as being transferred from the PAC to WSAJ during the period of time potentially covered by any action that might be brought by the State of Washington was transferred to pay for expenses incurred by the PAC in exchange for services described most commonly as ‘Administration Fees’ or ‘Admin. Fees,’ or occasionally as ‘Reimbursement, Professional Services.’ ”
- “Because there is no evidence that WSAJ conveyed anything of value to WSAJ PAC or any other political committee during the last five years other than as a result of a transaction whereby the item of value was purchased from it by the PAC, there is no evidence to support this allegation [that WSAJ made unreported in-kind contributions] and it should be rejected in its entirety.”
- “WSAJ may have violated RCW 42.17A.630(2)(a) by failing to report monetary contributions to political committees.”
- “Subject to further investigation and review by the undersigned, it does appear that WSAJ may have failed, in its role as a lobbyist employer, to report each and every contribution it has made to a political committee on a monthly basis on an L3c form, and these contributions were not otherwise reported on an L2 form, as would have been permitted (in the alternative) by RCW 42.17A.630(2)(b)...there does appear to be a basis for the PDC and the Office of the Attorney General to conclude that WSAJ has improperly failed to comply with the requirements of RCW 42.17A.630(2)(b)³ by failing to properly report certain of its monetary contributions to political committees on an L3c form.”

³ Here, it appears Mr. Iglitzin may have intended to refer to RCW 42.17A.630(2)(a), which requires lobbyist employers to file special reports of contributions.

IV.

SCOPE

4.1 PDC staff reviewed the following documents:

1. A 45-Day Citizen Action Notice filed on January 25, 2016 with the Washington Attorney General and Thurston County Prosecutor by David Dewhirst and James Abernathy, alleging violations by WSAJ, Gerhard Letzing, and Suone Cotner;
2. Information concerning WSAJ available on the WSAJ Web site, www.washingtonjustice.org;
3. PDC campaign finance and lobbying reports and data;
4. A response to the Citizen Action Notice, received on February 25, 2016 from Dmitri Iglitzin, counsel to WSAJ; and
5. Subsequent email correspondence received from Mr. Iglitzin.

V.

LAW

RCW 42.17A.630⁴ requires an employer of a registered Washington State lobbyist to file an annual report with the Commission disclosing, among other information, all contributions made in the prior calendar year to a political committee supporting or opposing a candidate for state office. The law further requires a lobbyist employer to file a special report if the employer makes a contribution or contributions aggregating more than \$110 in a calendar month to a candidate, elected official, officer or employee of an agency, or political committee, unless the contribution is reported by the lobbyist under RCW 42.17A.615.

Respectfully submitted this 9 day of March 2016.



Tony Perkins
PDC Compliance Officer

⁴ For periods prior to January 1, 2012, RCW 42.17A.630 was codified as RCW 42.17.180.

EXHIBIT LIST

- Exhibit 1** Citizen Action Notice submitted by David Dewhirst and James Abernathy on January 25, 2016 (without exhibits).
- Exhibit 2** Response to the Citizen Action Notice, received on February 25, 2016 from Dmitri Iglitzin, counsel to WSAJ.
- Exhibit 3** Stop the Insurance Industry Takeover (No on I-1082) C-3 report filed on October 11, 2010.
- Exhibit 4** Contributions attributed to WSAJ, February 1, 2011 - March 1, 2016.
- Exhibit 5** February 29, 2016 email from Dmitri Iglitzin to PDC staff.
- Exhibit 6** March 7, 2016 email from Dmitri Iglitzin to PDC staff.
- Exhibit 7** WSAJ L-3 Lobbyist Employer report for calendar year 2012, filed on February 28, 2013.
- Exhibit 8** C-6 Independent Expenditure political advertising report filed by Our Washington on September 13, 2012.



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myFreedomFoundation.com

January 25, 2016

Bob Ferguson
Washington Attorney General
1125 Washington Street SE
P.O. Box 40100
Olympia, WA 98504-0100

Jon Tunheim
Thurston County Prosecuting Attorney
2000 Lakeridge Drive S.W., Building 2
Olympia, WA 98502

Dear Messrs. Ferguson and Tunheim,

I write pursuant to RCW 42.17A.765(4) to report multiple violations of the Public Disclosure Act (“PDA”), RCW 42.17A, by the Washington State Association for Justice (“WSAJ”), and by Gerhard Letzing and Suone Cotner in their respective capacities as Executive Director and Deputy Director of WSAJ, respectively (“WSAJ officers”).

As a lobbyist employer, WSAJ violated RCW 42.17A.630 by failing to file legally required reports detailing its monetary and in-kind contributions to political committees. At least **\$160,984** worth of monetary expenditures by WSAJ remains unreported to the PDC. Further, WSAJ failed to file at least **\$1,467,387** of in-kind contributions to its continuing political committee as well as other political committees.

A. Violation of RCW 42.17A.630.

WSAJ violated, and continues to violate, RCW 42.17A.630. RCW 42.17A.630(2) requires a lobbyist employer to file monthly reports detailing its monetary and in-kind contributions totaling more than \$110 to candidates, elected officials, officers of public agencies, or political committees. Lobbyist employers are required to submit these monetary and in-kind contributions on either an “Employer of Lobbyist Monthly Political Contribution Report,” also known as an L-3c, or on its lobbyists’ L2 reports. WSAJ engages in lobbying activity and is therefore considered a lobbyist employer. The PDC lists WSAJ’s lobbyists’ L2 reports from 2009-2014. See **Exhibit 1**. As a lobbyist employer, WSAJ failed to file reports detailing its monetary and in-kind contributions to candidates, elected officials, officers, or political committees.

Unreported Monetary Contributions

Based on C3 reports filed by political committees and candidates from 2010-present, WSAJ contributed at least **\$160,984** to **candidates** and other **political committees**. See **Exhibit**

2. WSAJ reported none of these contributions on any L-3c or L-2 reports. Thus, WSAJ violated RCW 42.17A.630 by failing to report at least **\$160,984** in monetary contributions.

Unreported In-Kind Contributions

Additionally, the Washington State Association for Justice Justice for All PAC (“WSAJ PAC”), WSAJ’s own continuing political committee, reimbursed WSAJ for administration fees and professional services, indicating that WSAJ has made substantial, unreported in-kind contributions to its own continuing political committee. From 2012 to the present, WSAJ PAC reimbursed WSAJ at least **\$636,310** for its in-kind contributions to WSAJ PAC. See **Exhibit 3**.

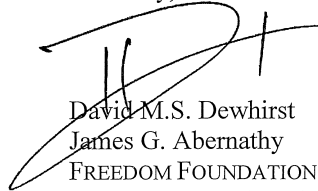
Moreover, from 2010 to present, other political committees reported reimbursements paid to WSAJ for its substantial in-kind contributions and a \$500,000 loan, a sum totaling at least **\$831,077**. See **Exhibit 4**. Therefore, WSAJ has neglected to report at least **\$1,467,387** to the PDC over the last five years. WSAJ’s failure to report these and additional in-kind contributions on required Forms L-3c or L2 demonstrate extensive and ongoing violations of RCW 42.17A.

RCW 42.17A.630(2) requires lobbyist employers to file monthly reports detailing any and all monetary or in-kind contributions of more than \$110 to candidates, elected officials, officers of public agencies, or political committees. As indicated above, WSAJ has made numerous monetary and in-kind contributions exceeding \$110 to candidates and political committees, but failed to file the reports required by § 630(2). Thus, WSAJ violated RCW 42.17A.630.

B. Conclusion.

As explained above, WSAJ violated and continues to violate RCW 42.71A.630. This Citizen Action Notice provides only some of the evidence demonstrating WSAJ’s violations. We respectfully request that the Washington Attorney General’s Office and/or the county prosecuting attorneys investigate these violations as expeditiously and efficiently as possible. Please do not hesitate to contact me if I can be of assistance. Thank you.

Sincerely,



David M.S. Dewhirst
James G. Abernathy
FREEDOM FOUNDATION
P.O. Box 552, Olympia, WA 98507
PH: 360.956.3482
DDewhirst@myfreedomfoundation.com
JAbernathy@myfreedomfoundation.com

DMITRI IGLITZIN
Iglitzin@workerlaw.com

*Original via US First Class mail and
Via email to pdcc@pdcc.wa.gov*

February 25, 2016

Tony Perkins
Director of Compliance
Washington State Public Disclosure Commission
711 Capitol Way S.
Olympia, WA 98504

RE: Complaint from The Freedom Foundation
PDC Case No. 2863
SCBIL File No.: 6533-001

Dear Mr. Perkins:

We write to you on behalf of our client, the Washington State Association for Justice (“WSAJ”), in response to the letter we received from you on February 12, 2016, regarding a 45-day Citizen Action Letter filed by The Freedom Foundation (“FF”) with the Washington Attorney General’s office on January 26, 2016 (“Complaint”).

Given the short timeline within which you have asked us to submit a written response to your letter, this reply will of necessity be brief and summary in nature. Without having had the time to exhaustively review every monthly and other report that has been filed by WSAJ and WSAJ Justice For All PAC (“WSAJ PAC”) for the last five years, it appears reasonably certain that, with the exception of possible technical violations of RCW 42.17A.630(2)(a), WSAJ has not engaged in any of the violations alleged by FF, and both the Public Disclosure Commission and the Attorney General’s office should so conclude.

WSAJ did not violate RCW 42.17A.630(2)(a) by failing to report in-kind contributions to WSAJ Justice For All PAC.

On the second page of the Complaint, FF asserts that WSAJ “made substantial, unreported in-kind contributions” to its own continuing political committee, WSAJ PAC. It bases this claim on evidence that “[f]rom 2012 to the present, WSAJ PAC reimbursed WSAJ at least \$636,310 for its in-kind contributions to WSAJ PAC.”

FF misunderstands its own asserted evidence. The “Schedule A” forms submitted by WSAJ PAC along with that PAC’s C4 filings plainly show that all of the money which was reported as being transferred from the PAC to WSAJ during the period of time potentially covered by any action that might be brought by the State of Washington was transferred to pay for expenses incurred by the PAC in exchange for services described most commonly as “Administration Fees” or “Admin. Fees,” or occasionally as “Reimbursement, Professional

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Services.” Rather than these entries reflecting prior, unreported in-kind contributions from WSAJ to the PAC, they show that there were no such contributions. Instead, WSAJ PAC was simply purchasing from WSAJ the value of WSAJ staff time, including overhead, for its own use. This transaction does not constitute a contribution of anything of value from WSAJ to the PAC, any more than any other purchase of any item by the PAC transforms the seller’s portion of the transaction into a contribution.¹

As it happens, there are notations on the Schedule B filings of certain PACs indicating the receipt of in-kind contributions from WSAJ by a *different* PAC, not WSAJ PAC. *See, e.g.*, the Stop Insurance Industry Takeover (“SIIT”) PAC August 10 and September 14, 2010, C4, Schedule B forms, showing an in-kind contribution from WSAJ in the amount of \$8,000 for each of those months, SIIT PAC’s October 12, 2010, C4 Schedule B, showing a similar in-kind contribution from WSAJ in the amount of \$10,500, and SIIT PAC’s December 10, 2010, C4 Schedule B, showing the same, in the amount of \$4,278.78. All of these in-kind contributions from WSAJ to SIIT PAC, which arguably should also have been reported by WSAJ at the time on L3c forms, appear to have occurred, and then completely ceased, well more than five years ago, and thus are too stale to be addressed in any legal proceeding brought by the Attorney General or the PDC.

Other than the in-kind contributions made by WSAJ to SIIT PAC, there does not appear to be any evidence of any such contributions made by WSAJ to any other political committee. While there is evidence, as noted in the documents attached as Exhibit 4 to the Complaint, that political committees other than WSAJ paid money to WSAJ, these payments, like the expenditures made by WSAJ PAC to WSAJ discussed above, are clearly designated as payment for administrative services rendered by WSAJ to those committees in the preceding month or other appropriate reporting period. Contrary to the allegation made in the Complaint, these reports do not reflect prior unreported contributions made by WSAJ to those committees; thus, they are not evidence of any reporting violations by WSAJ.

Because there is no evidence that WSAJ conveyed anything of value to WSAJ PAC or any other political committee during the last five years other than as a result of a transaction whereby the item of value was purchased from it by the PAC, there is no evidence to support this allegation and it should be rejected in its entirety.

WSAJ may have violated RCW 42.17A.630(2)(a) by failing to report monetary contributions to political committees.

Review of the C4 forms filed by WSAJ PAC indicates that WSAJ, on a fairly regular basis, made contributions to WSAJ PAC in a calendar month exceeding \$110 (or more than \$100, prior to December 2014).

¹ These transactions should not be confused with contributions made by WSAJ PAC to the Washington State Association for Justice Justice In Action PAC (“WSAJ Justice In Action PAC”), a separate political committee. Notations on the C4, Schedule A forms filed by WSAJ PAC that indicate expenditures made to “Washington State Association” which are described as “Contrib. Calendar Year,” followed by the pertinent year, reflect contributions made by the PAC to the WSAJ Justice In Action PAC. Those transactions do not reflect or provide evidence of anything of value being conveyed by WSAJ PAC to WSAJ.

RCW 42.17A.630(2)(a) provides that an employer of a lobbyist registered under that chapter (which WSAJ is) must file a "special report" with the PDC, known as an L3c report, within fifteen days after the last day of the calendar month during which the contribution was made. It appears that WSAJ may have inadvertently failed to comply with this requirement, about which it was at all times pertinent hereto entirely unaware. Although all of the contributions WSAJ made to WSAJ PAC were, to WSAJ's knowledge, properly reported on C4 forms by the recipient political committee (which, indeed, is why both the fact and the dates and amounts of these contributions, although unreported by WSAJ, may be definitively established), this may constitute a technical violation of the law.

Conclusion

Subject to further investigation and review by the undersigned, it does appear that WSAJ may have failed, in its role as a lobbyist employer, to report each and every contribution it has made to a political committee on a monthly basis on an L3c form, and these contributions were not otherwise reported on an L2 form, as would have been permitted (in the alternative) by RCW 42.17A.630(2)(b). While there is no evidence that any WSAJ staff member performed "[m]ore than incidental PAC-related functions" (*see* the PDC's Political Committees Campaign Disclosure Instructions (June 2014), at p. 59) during the last five years, without WSAJ being paid for that time by the appropriate political committee, there does appear to be a basis for the PDC and the Office of the Attorney General to conclude that WSAJ has improperly failed to comply with the requirements of RCW 42.17A.630(2)(b) by failing to properly report certain of its monetary contributions to political committees on an L3c form.

We look forward to discussing this issue further with the PDC and the Office of the Attorney General, as appropriate.

Please do not hesitate to contact us if you have any questions, or if we can be of further assistance.

Sincerely,

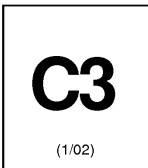


Dmitri Iglitzin
Counsel for WSAJ

cc: Linda A. Dalton, Sr. Asst. Atty. General
Chad Standifer, Asst. Atty. General
Phil Stutzman, Public Disclosure Commission
Gerhard Letzing
Larry Shannon



CASH RECEIPTS MONETARY CONTRIBUTIONS



THIS SPACE FOR OFFICE USE

100383540

10-11-2010

Candidate or Committee Name (Do not abbreviate. Use full name.) Stop Insurance Industry Takeover			
Mailing Address 603 Stewart St. #819			
City Seattle, WA	Zip + 4 98101	Office Sought (candidates)	Election Date 2010

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).....		
10/08/10	c. Loans, notes, security agreements. Attach Schedule L	500,000.00	
	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
10/08/10	RICHARD P BEAUDRY 23323 SE 169th Street Maple Valley, WA 98038	Attorney at Law (Retired) Maple Valley, WA Occupation: ATTORNEY - LAWYER			500.00	600.00
10/08/10	H. PAUL GILL 1001 FOURTH AVE #3200 SEATTLE, WA 98154	HPG, PLLC, BARRISTERS & SOLICITORS, ATTORNEYS AT L SEATTLE, WA Occupation: ATTORNEY			500.00	500.00
10/08/10	MANN & KYTLE 200 2nd Avenue W Seattle, WA 98119	 Occupation			500.00	500.00
10/08/10	CHARLES ROBINOWITZ 1211 SW 5th Avenue Portland, OR 97204	Law Offices of Charles Robinowitz Portland, OR Occupation: ATTORNEY - LAWYER			250.00	250.00
10/08/10	JEFFREY H SADLER 705 S 9TH ST, SUITE 305 TACOMA, WA 98405	SADLER LAW FIRM, PS TACOMA, WA Occupation: ATTORNEY			250.00	750.00
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total			502,000.00	*See reverse for details.
		Amount from attached pages			3,000.00	

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.

505,000.00

4. Date of Deposit 10/08/10	I certify that this report is true and complete to the best of my knowledge
Treasurer's Daytime Telephone No.: (206) 382-5552	Treasurer's Signature Philip Lloyd
	Date 10-11-2010

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Stop Insurance Industry Takeover

Deposit Date
 10/08/10

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*
10/08/10	STEPHEN A TELLER 1139 34TH AVE #B SEATTLE, WA 98122	TELLER & ASSOCIATES SEATTLE, WA Occupation ATTORNEY			3,000.00	4,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total 3,000.00

LOANS

**SCHEDULE
TO C3
OR C4**

L
(12/99)

Page 3

Candidate or Committee Name

Report Date

~~Stop Insurance Industry Takeover~~

1. MONETARY OR IN-KIND LOAN RECEIVED. Loans are considered contributions and are subject to any applicable limit.

Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
10/08/10	WASHINGTON STATE ASSOCIATION 1809 7th Avenue Suite 1500 Seattle, WA 98101	<input type="checkbox"/>	<input type="checkbox"/>	500,000.00	0.0%		
<p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liabie For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer	
		<input type="checkbox"/>	<input type="checkbox"/>			Endorser's Occupation and Name, City, & State of Employer	
Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
		<input type="checkbox"/>	<input type="checkbox"/>				
<p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liabie For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer	
		<input type="checkbox"/>	<input type="checkbox"/>			Endorser's Occupation and Name, City, & State of Employer	
Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
		<input type="checkbox"/>	<input type="checkbox"/>				
<p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liabie For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer	
		<input type="checkbox"/>	<input type="checkbox"/>			Endorser's Occupation and Name, City, & State of Employer	
Date Loaned	Lender's Name and Address	P R I	G E N	Amount of Loan	Annual Interest Rate	Repayment Schedule	Date Due
		<input type="checkbox"/>	<input type="checkbox"/>				
<p>If monetary loan, also include this amount on line 1c, C3 report. If in-kind loan, itemize in Part 1 of Schedule B. →</p>							
Name and Address of Each Loan Endorser, Co-Signer		P R I	G E N	Amount Liabie For (Same as Loan Amount)	Aggregate Total	Lender's Occupation and Name, City & State of Employer	
		<input type="checkbox"/>	<input type="checkbox"/>			Endorser's Occupation and Name, City, & State of Employer	

Contributions Attributed to WSAJ, February 2011 - March 2016

Name	Contributor	Date	Amount	P/G
WA ST ASSN FOR JUSTICE JUSTICE IN ACTION PAC	WASHINGTON STATE ASSOCIATION FOR JUSTICE	2012-01-10	11872.8	N
GIZZI JAMES A	WASHINGTON STATE ASSOCIATION FOR JUSTICE	2012-06-27	900	P
OUR WASHINGTON	WA STATE ASSN FOR JUSTICE	2012-10-12	70000	N
WA ST ASSN FOR JUSTICE JUSTICE IN ACTION PAC	WASHINGTON STATE ASSOCIATION FOR JUSTICE	2012-12-15	23554.81	N
WA ST ASSN FOR JUSTICE JUSTICE IN ACTION PAC	WASHINGTON STATE ASSOCIATION FOR JUSTICE	2013-03-15	7495.79	N
WA ST ASSN FOR JUSTICE JUSTICE IN ACTION PAC	WASHINGTON STATE ASSOCIATION FOR JUSTICE	2013-11-15	8274.2	N
JAYAPAL PRAMILA	WASHINGTON ASSOCIATION FOR JUSTICE	2014-05-23	950	P
MCCASLIN ROBERT B	WASHINGTON ASSOCIATION FOR JUSTICE	2014-06-20	950	P
		Total	123997.6	

Tony Perkins

From: PDC Support <pdcc@pdcc.wa.gov>
Sent: Monday, February 29, 2016 6:22 PM
To: Tony Perkins
Subject: [TICKET Customer Reply] - Washington State Association for Justice et al. - Alleged violation of RCW 42.17A.630

Hi Tony Perkins,

The customer has responded to the ticket.

Washington State Association for Justice et al. - Alleged violation of RCW 42.17A.630

Ticket comment

Tony:

Here are WSAJ's answers and clarifications regarding your questions.

1. In your response to the Freedom Foundation complaint, you state that within the five-year period for state actions, WSAJ has made regular contributions exceeding the L-3c reporting thresholds to "WSAJ PAC," which you identify earlier in the letter as WSAJ Justice For All PAC. However, WSAJ Justice For All PAC did not report receipt of contributions from WSAJ during that time. Rather, during the last five years WSAJ Justice In Action PAC reported receipt of \$51,197.60 in contributions from WSAJ. Please confirm whether you intended to identify WSAJ Justice in Action PAC, and not Justice For All PAC, as the recipient of WSAJ's contributions.

You are correct; my response letter used the name of the wrong PAC on this point.

2. The attached spreadsheet contains details of all contributions attributed to WSAJ in PDC filings during the last five years, including the four contributions to WSAJ Justice In Action PAC totaling \$51,197.60. These contributions are also documented in the attached C-3 reports submitted by WSAJ Justice In Action PAC, and certified by Gerhard Letzing. Please confirm whether these contributions were in fact made through four, and no more than four, payments executed on or around the reported dates of receipt, or if they represent a larger number of contributions made over time and reported in lump sum. If the contributions were made through more than four payments, please identify the correct date and amount of each contribution.

These contributions were in fact made through four, and no more than four, payments executed on or around the reported dates of receipt, as reported by WSAJ Justice in Action PAC.

3. During the last five years three candidates, James Gizzi, Pramila Jayapal, and Robert McCaslin, have disclosed contributions attributed to WSAJ. (See the highlighted entries in the attached spreadsheet.) PDC staff's review indicates that WSAJ does not typically make candidate contributions from association funds, but rather uses WSAJ Justice For All PAC to make candidate contributions. In fact, WSAJ Justice For All PAC has reported expenditures to the three candidates listed above which appear to correspond to the contributions attributed to WSAJ. Please confirm whether these three contributions were correctly attributed to WSAJ, or instead were made by WSAJ Justice For All PAC.

Your guess that the candidate contributions were made by Justice For All PAC, not WSAJ, and were misreported by the recipients is correct. All of these contributions were made by Justice For All PAC.

4. The attached spreadsheet also includes a \$70,000 contribution attributed to WSAJ in a report filed by the Our Washington political committee. Unlike the candidate contributions discussed above, no WSAJ-affiliated PAC has disclosed making a contribution that clearly corresponds to this \$70,000 contribution to Our Washington, so it would appear that the contribution did come from WSAJ funds, and was properly attributed to WSAJ. Please confirm.

That is correct – the \$70,000 contribution attributed to WSAJ in the report filed by Our Washington PAC was accurately reported. Although it, like the four contributions from WSAJ to WSAJ Justice In Action PAC, was reported properly by the receiving committee, it does not seem to have been timely reported by WSAJ in an L3c report or an any L2 report.

Please let me know if you have any following questions on this matter.

Thanks much,

DI

Dmitri Iglitzin | Schwerin Campbell Barnard Iglitzin & Lavitt, LLP | 206.257-6003 | www.workerlaw.com

Union Representation - Strategic Organizing - Campaign Finance

This communication is intended for a specific recipient and may be protected by the attorney-client and work-product privilege.

From: PDC Support [mailto:pdc@pdc.wa.gov]
Sent: Friday, February 26, 2016 4:22 PM
To: Dmitri Iglitzin
Cc: William Lemp
Subject: Re: PDC - Washington State Association for Justice et al. - Alleged violation of RCW 42.17A.630

Dear Dmitri,

Thanks for speaking with me this afternoon. As we discussed, please consult with your client and provide a response to the following issues:

1. In your response to the Freedom Foundation complaint, you state that within the five-year period for state actions, WSAJ has made regular contributions exceeding the L-3c reporting thresholds to "WSAJ PAC," which you identify earlier in the letter as WSAJ Justice For All PAC. However, WSAJ Justice For All PAC did not report receipt of contributions from WSAJ during that time. Rather, during the last five years WSAJ Justice In Action PAC reported receipt of \$51,197.60 in contributions from WSAJ. Please confirm whether you intended to identify WSAJ Justice in Action PAC, and not Justice For All PAC, as the recipient of WSAJ's contributions.
2. The attached spreadsheet contains details of all contributions attributed to WSAJ in PDC filings during the last five years, including the four contributions to WSAJ Justice In Action PAC totaling \$51,197.60. These contributions are also documented in the attached C-3 reports submitted by WSAJ Justice In Action PAC, and certified by Gerhard Letzing. Please confirm whether these contributions were in fact made through four, and no more than four, payments executed on our around the reported dates of receipt, or if they represent a larger number of contributions made over time and reported in lump sum. If the contributions were made through more than four payments, please identify the correct date and amount of each contribution.
3. During the last five years three candidates, James Gizzi, Pramila Jayapal, and Robert McCaslin, have disclosed contributions attributed to WSAJ. (See the highlighted entries in the attached spreadsheet.) PDC staff's review indicates that WSAJ does not typically make candidate contributions from association funds, but rather uses WSAJ Justice For All PAC to make candidate contributions. In fact, WSAJ Justice For All PAC has reported expenditures to the three candidates listed above which appear to correspond to the contributions attributed to WSAJ. Please confirm whether these three contributions were correctly attributed to WSAJ, or instead were made by WSAJ Justice For All PAC.
4. The attached spreadsheet also includes a \$70,000 contribution attributed to WSAJ in a report filed by the Our Washington political committee. Unlike the candidate contributions discussed above, no WSAJ-affiliated PAC has disclosed making a contribution that clearly corresponds to this \$70,000 contribution to Our Washington, so it would appear that the contribution did come from WSAJ funds, and was properly attributed to WSAJ. Please confirm.

Thanks for your attention to this. If possible, a response by close of business on Tuesday, March 1, 2016 would be appreciated.

Sincerely,

Tony Perkins
PDC Compliance & Enforcement Staff

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To respond, please reply to this email.

Washington Public Disclosure Commission
<http://www.pdc.wa.gov>
1.360.753.1111

On Fri, 26 Feb at 1:28 PM , PDC Support <pdc@pdc.wa.gov> wrote:
Perfect, Dmitri. I'll be waiting by the phone.

Tony

by **Iglitzin** on **Mon, 7 Mar 2016**

Washington State Association for Justice et al. - Alleged violation of RCW 42.17A.630

Good morning, Tony:

I am writing with some followup information that relates to statements made in your February 26, 2016, e-mail, and my response to that e-mail.

In your e-mail, to which an Excel spreadsheet was attached, you stated:

2. The attached spreadsheet contains details of all contributions attributed to WSAJ in PDC filings during the last five years, including the four contributions to WSAJ Justice In Action PAC totaling \$51,197.60. These contributions are also documented in the attached C-3 reports submitted by WSAJ Justice In Action PAC, and certified by Gerhard Letzing. Please confirm whether these contributions were in fact made through four, and no more than four, payments executed on or around the reported dates of receipt, or if they represent a larger number of contributions made over time and reported in lump sum. If the contributions were made through more than four payments, please identify the correct date and amount of each contribution.

In my February 29 response to your e-mail, I clarified that the four contributions referenced in your e-mail (relevant portion highlighted in yellow, above) "were in fact made through four, and no more than four, payments executed on or around the reported dates of receipt, as reported by WSAJ Justice in Action PAC."

What I did not realize on the date I sent that e-mail, however, and what I am writing to you now to clarify, is that while the four payments were in fact made as described and executed on or around the reported dates of receipt, as reported by WSAJ Justice in Action PAC, *three of those payments were not contributions from WSAJ*. Instead, they were contributions made to WSAJ Justice in Action PAC from WSAJ Justice For All PAC. The three payments are the payments that were reported on December 15, 2012, March 15, 2013, and November 15, 2013.

What that means, in light of the other information the PDC has dug up and the clarifications we have provided, is that over the last five years, there appear to have been only *two* contributions from WSAJ to any political committee that WSAJ failed to report properly, i.e., that WSAJ failed to report on an L3c form: the October 12, 2012, contribution from WSAJ to Our Washington, which we have previously discussed, and a \$11,872.80 contribution from WSAJ to WSAJ Justice In Action PAC reported on January 10, 2012.

If that is correct, and we think it is, then we suggest that the appropriate recommendation for the PDC staff to make to the Commission on Thursday is that any fine for these two relatively minor and technical violations,

which occurred approximately three- and-a-half years ago, or longer, be waived, pursuant to the Commission's authority to waive fines in the case of first-time violations (RCW 42.17A. 755(5)), and that we simply be ordered to now file the appropriate L3c forms.

Please give me a call at your earliest possible convenience, after you receive this e-mail, so you and I can discuss this situation in more detail.

Thanks so much,

Dmitri Iglitzin | Schwerin Campbell Barnard Iglitzin & Lavitt, LLP | 206.257-6003 | www.workerlaw.com (<http://www.workerlaw.com/>)

Union Representation - Strategic Organizing - Campaign Finance

This communication is intended for a specific recipient and may be protected by the attorney-client and work-product privilege.

PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 TOLL FREE 1-877-601-2828	Employer's Lobbying Expenses	L3 1/09	THIS SPACE FOR OFFICE USE RECEIVED FEB 28 2013 Public Disclosure Commission
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1. Employer's Name (Use complete company, association, union or entity name.) Washington State Association for Justice				Public Disclosure Commission Year Report Covers 2012
Attention (Identify person to whom inquiries about the information below should be directed; NOT the lobbyist.) Gerhard Letzing				
Mailing Address 1809 7 th Avenue #1500		Telephone (206) 464-1011		
City Seattle	State WA	Zip + 4 98101	E-Mail Address gerhard@washingtonjustice.org	

THIS REPORT MUST BE FILED BY THE LAST DAY OF FEBRUARY. Include expenditures made and accrued during the previous calendar year for lobbying the Washington State Legislature and/or any state agency. Complete all sections. Use "none" or "0" when applicable.

2. Identify each of your lobbyists/lobbying firms below. In column 1, show the full amount of salary or fee each earned for lobbying. In column 2, show the full amount paid (plus obligated) for other lobbying related expenses that were made by or through the lobbyist and reported by the lobbyist on the monthly L-2 report (e.g., contributions to legislative candidates, reimbursement for entertainment expenses, etc.). Compute the subtotals across and down the columns; put the grand total of expenses incurred by or through lobbyists in the space designated.

Names of Registered Lobbyists (if payments were to lobbying firm, list firm name)	Col 1-Salary	Col 2-Other	Total Amount
Larry Shannon	\$ 125,000.00	\$ 15835.83	\$ 140,835.83
Michael Temple	156,000.00	18653.66	\$174,653.66
Lindsey Grad	\$38,664	0	\$38,664
Total From Attached Page			
<input type="checkbox"/> Information continued on attached pages			Total Expenses By or Through Lobbyists \$ 354,153.49

DO NOT INCLUDE EXPENDITURES ALREADY ACCOUNTED FOR IN ITEM 2 ABOVE when completing Items 3 through 7 below.

3. Other expenditures made by the employer for lobbying purposes. Show total expenditures made/accrued:	
a. to vendors on behalf of or in support of registered lobbyists (e.g., entertainment credit card purchases);	\$ 0
b. to or on behalf of expert witnesses or others retained to provide lobbying services who offer specialized knowledge or expertise that assists the employer's lobbying effort;	0
c. for entertainment, tickets, passes, travel expenses (e.g., transportation, meals, lodging, etc.) and enrollment or course fees provided to legislators, state officials, state employees and members of their immediate families; (Also complete Item 9.)	0
d. for composing, designing, producing and distributing informational materials for use primarily to influence legislation; and	0
e. for grass roots lobbying expenses, including those previously reported by employer on Form L-6, and payments for lobbying communications to clients/customers (other than to corporate stockholders and members of an organization or union).	0
4. Political contributions to candidates for legislative or statewide executive office, committees supporting or opposing these candidates, or committees supporting or opposing statewide ballot measures. (Also complete Item 10.)	
a. Contributions made directly by the employer, including those previously reported on PDC Form L-3c.	0
b. If contributions were made by a political committee associated, affiliated or sponsored by the employer, show the PAC name below. (Information reported by the PAC on C-4 reports need not be again included as part of this L-3 report.)	0
Name of PAC _____	
5. Independent expenditures supporting or opposing a candidate for legislative or statewide executive office or a statewide ballot measure. (Also complete Item 11.)	0
6. Expenditures to or on behalf of legislators, state officials, or their spouse, registered domestic partner and dependents for the purpose of influencing, honoring or benefiting the legislator or official. (Normal course of business payments are not reportable.) (Also complete Item 14.)	0
7. Other lobbying-related expenditures, whether through or on behalf of a registered lobbyist. Attach list itemizing each expense (i.e., show date, recipient, purpose and amount). Do not include payments accounted for above.	0
Total Lobbying Expenses	\$ 354,153.49

8. This report must be certified by the president, secretary-treasurer or similar office of lobbying employer. (Items 2 thru 7)

Certification: I certify that this report is true, complete and correct to the best of my knowledge.	Signature of Employer Officer
Printed Name and Title of Officer: Gerhard Letzing, Executive Director	Date 2/27/13

Reporting Form for: (check one)

Instructions on Page 3

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

1. Name and complete postal mailing address of sponsor: OUR WASHINGTON PO BOX 9100 SEATTLE, WA 98109	E-mail
	INFO@ARGOSTRATEGIES
	Telephone
	206-325-5013

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

Date Made	Date First Presented/ Mailed	Name and Address of Vendor or Recipient	Description of Expenditure (e.g., direct mail or newspaper, TV or radio ad)	Amount or Value (*See Below)
09/07/12	09/12/12	RISING TIDE INTERACTIVE LLC 1133 19TH ST NW #301 WASHINGTON, DC 20036	WEBSITE DEVELOPMENT	2,500.00
09/11/12	09/12/12	RISING TIDE INTERACTIVE LLC 1133 19TH STREET NW WASHINGTON, DC 20036	WEBSITE DEVELOPMENT	2,500.00
09/11/12	09/12/12	RISING TIDE INTERACTIVE LLC 1133 19TH STREET NW #301 WASHINGTON, DC 20036	ONLINE ADS (YOUTUBE, YUME, AOL, ADAP.TV, BRIGHTROLL, DSPOLITICAL	132,300.97
Expenditures \$100 or less not itemized above				\$ 0.00

Amount or Value	Total this report	\$ 137,300.97
*If no reasonable estimate can be made of value, describe activity, services, property or right furnished precisely and attach copy of item produced or distributed.	Total independent expenditures and electioneering communications made during this election campaign. Include amounts shown in this report and previously submitted C-6 reports.	\$ 137,300.97

3. List of candidate(s) or ballot proposition(s) identified in the advertising.					Show portion of current expense attributable to each candidate or proposition	Show total C-6 expenses related to each candidate/ proposition during election campaign
Candidate/Proposition	Office/District/ Proposition No.	Party	Check Support or Oppose			
MCKENNA, ROBERT	GOVERNOR/ GOVERNOR, OFFICE OF	REPUBLIC	<input type="checkbox"/>	<input checked="" type="checkbox"/>	\$ 137,300.97	\$ 137,300.97
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$
			<input type="checkbox"/>	<input type="checkbox"/>	\$	\$

Continued on attached sheet