Office Use Only: No._____

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WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION
COMPLAINT FORM

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:
Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,
123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown
Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,
Phone: 555-123-4567, Email: pag@pag.org

Washington State Republican Party
2840 Northrup Way, Suite 140
Bellevue, WA 98004
Phone: 425-460-0570, email: luke@wsrp.org

2. ALLEGED VIOLATIONS:
Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17 or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed.

The Washington State Republican Party has violated campaign finance law in hiding from public scrutiny its financial expenditures in the State Senate race for the 26th Legislative District. On 7/29, a piece supporting Marty McClendon was mailed to houses throughout the 26th District. See attached. At the bottom of the mailer is the tagline 'Paid for and authorized by the Washington State Republican Party.' However, no record of payment for this piece, in this race, appears on PDC for the WSRP. If this piece was put out in conjunction with the McClendon campaign, then it must be reported as an in-kind contribution by the WSRP on a C4 report according to RCW 42.17.080, clause 2(c). If the WSRP acted alone, then it must be reported on a C6 report as an independent expenditure, according to RCW 42.17.080, caluse 2(c). Either way, the WSRP has violated WA State campaign finance disclosure requirements.

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Evidence and Witnesses

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3. EVIDENCE:
List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

Example: Emails between Joe public and Candidate X, attached OR
Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.

See attached.

4. WITNESSES:
List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

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

Unknown.

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Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Alvin M Brown

Street address 1129 Koda Circle SE

City, state and zip code Port Orchard WA 98366

Telephone number (including area code) 360-271-0261

E-mail address (optional) almarbro@wavecable.com

Oath

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature Alvin M. Brown

Date signed Sept. 3, 2010

Place signed (city and county)
Port Orchard Kitsap

City **County**

Attachments

☒ **Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.**

**RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*

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Washington State Public Disclosure Commission
Instructions for Filing a Formal Complaint

When to use the formal complaint form:

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at www.pdc.wa.gov. If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

How to submit your complaint form to the PDC:

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

If you have more questions:

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at www.pdc.wa.gov under "Enforcement and Compliance." You may also contact the PDC directly.

PDC Contact Information

MAILING ADDRESS: Washington State Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

EMAIL ADDRESS: pdc@pdc.wa.gov

PHONE: 1-877-601-2828 (toll free)

FAX: (360) 753-1112

HOURS: Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.

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Formal Complaint to the Washington State Public Disclosure Commission
For Complaints Relating to Elected Official or Candidate for Public Office
(If the Sample Complaint Form is Not Used)

Name of Official or Candidate: Washington State Republican Party

Address of Official or Candidate: 2840 Northup Way, Suite 140

Official's or Candidate's Bellevue (City) WA (State) 98004 (Zip Code)

Official's or Candidate's Telephone: 425-460-0570 (Include Area Code)

Official's or Candidate's E-Mail Address: _____ (If known)

Your signature: Sam Hunt

Your printed name: Sam Hunt

Street address: 1000 Aurora Ave N #100

City, state and zip code: Seattle WA 98109

Telephone number: 206-381-1220

E-Mail Address: (Optional) repsamhunt@comcast.net

Date Signed: 11-10-2010

Place Signed (City and County): Olympia (City) Thurston (County)

Complaint: Attach Complaint and Certification

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Certification for a
Complaint to the Washington State Public Disclosure Commission Relating to an Elected Official or Candidate for Public Office
(Notary Not Required)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature: Sam Hunt

Your printed name: Sam Hunt

Street address: 1000 Aurora Ave N #100

City, state and zip code: Seattle WA 98109

Telephone number: 206-381-1220

E-Mail Address: (Optional) repsamhunt@comcast.net

Date Signed: 11-10-2010

Place Signed (City and County): Olympia (City) Thurston (County)

*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

COMPLAINT ATTACHED

HDCC
HOUSE DEMOCRATIC CAMPAIGN COMMITTEE

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Public Disclosure Commission

November 8, 2010

Mr. Phil Stutzman
Public Disclosure Commission
711 Capitol Way #206
PO Box 40908
Olympia, WA 98504-0908

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding improper disclosure filings by the House Republican Organizational Committee (HROC) and the Washington State Republican Party.

On October 12th, 2010, HROC filed its required form C4. That report, signed by Cary Condotta, covered campaign activities from September 1st through October 11th and listed a cash-on-hand balance of $150,904.38.

October 12th marks the beginning of the "21 day rule" which requires timely disclosure of contributions over $1,000 and restricts contributions over $5,000 to bona fide State Parties exclusively.

On October 25th, the State Republican Party filed a Last Minute Contribution (LMC) stating they received the following contributions:

- 10/22/10 SRCC $83,500
- 10/22/10 SRCC $175,000
- 10/22/10 HROC $120,000

PDC staff work determined that these seemingly illegal contributions were in fact received by the October 11th deadline to move more than $5,000, but that means that both HROC and the State Republican Party failed to disclose the transfer of $120,000 in campaign cash for more than a week.

On October 25th, HROC filed an amended c4 showing a $120,000 contribution to the State Republican Party and disclosing a cash-on-hand balance of $30,904.38.

That amendment was 7 days late, effectively concealing $120,000 for that length of time.

One hundred and twenty thousand dollars is a lot of money at any point in the election cycle, but it is a particularly significant amount approaching the final 21 days of an election, as committees are scrutinizing budgets daily and making financial decisions leading up to a period of restricted

1000 Aurora Ave N, Unit N-100; Seattle, WA 98109 • (206) 381-1220 • FAX (206) 381-1235 • www.hdcc.org
Contributions made to the House Democratic Campaign Committee are not tax deductible.

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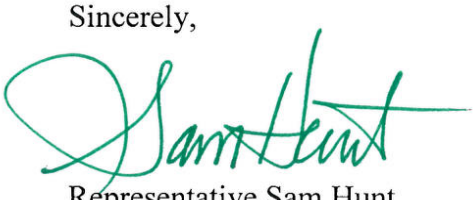
spending. There's a big difference between a cash-on-hand balance of $150,904.38 and $30,904.38 and it's unfathomable that this amount of money in one's bottom line could be overlooked in a c4 report or otherwise.

HROC and the State Republican Party have experienced personnel. They know the regulations surrounding the "21 Day Rule" and the reporting obligations that go with that--- no amount of spent money over $1,000 can be invisible for more than 24 hours, yet they failed to disclose 120 times the reportable limit for 7 times longer than the allowed timeframe.

It is impossible to imagine that veteran political professionals in *both* organizations accidentally failed to properly report the *same* $120,000 contribution in a known period of increased scrutiny. The SRCC, which as noted above made contributions to the State Republican Party totaling $258,500, managed to file the proper paperwork in a timely manner.

I respectfully request that the Public Disclosure Commission conduct a formal investigation and if wrongdoing is discovered impose appropriate penalties as determined by law.

Sincerely,



Representative Sam Hunt
22nd Legislative District