Office Use Only: No._____

RECEIVED
DEC 12 2011
Public Disclosure Commission

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

Brian Brooks, 503 S. McKinley St. Kennewick, WA 99336, 509-783-0861, brianbrooks59@msn.com, Ben Messinger, 111 E. 45th Ave, Kennewick, WA 99337, 509-987-5566, ben.messinger@gmail.com, Ron Mabry, 2525 S. Irving St., Kennewick, WA, 99338, 509-308-2698, carlvr509@yahoo.com, candidates for school director KSD 017

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.

Based on information from the campaign finance records of the candidates, there has been a cash contribution of $250. plus a loan of $938.98 totaling $1188.98 from Ty Haberling to each candidate. These candidates filed for mini reporting on Candidate Registration forms C1. The requirement that a single contributor donate no more than $500. in the aggregate to a candidate has been violated by each school board candidate.

RECEIVED
DEC 12 2011
Public Disclosure Commission

Evidence and Witnesses

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.

From my notes taken when reviewing each candidate's financial records I constructed a table. After review and approval by the candidates this table was published on ksdcitizens .org and is also provided in print. On ksdcitizens.org the specific article listing candidate campaign contributions and expenses is titled The Cost to Campaign for Kennewick School Board.

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.

I have email communications with each candidate. These communications will be provided electronically and in print.

RECEIVED
DEC 12 2011
Public Disclosure Commission

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) Tom Staly Jr.

Street address 4932 W. 24th Place

City, state and zip code Kennewick, WA 99338

Telephone number (including area code) 509-735-1446

E-mail address (optional) tstalyjr@charter.net

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 Thom C. Staly Jr.

Date signed 12-9-2011

Place signed (city and county)

KENNEWICK, WA — BENTON

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."*