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OCT 10 2012

**Public Disclosure Commission**

October 5, 2012

Washington State Attorney General's Office  
Attn: Attorney General Rob McKenna (R)  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504

RE: 45-Day Citizen's Action Letter related to James Watkin's complete failure to report financial dealings, as a candidate for public office pursuant to RCW 42.17A.765(A)

Mr. McKenna:

Please review the attached the Washington Public Disclosure Commission complaint and take all action, including prosecution for perjury, against James Watkins for misstating and omitting his financial dealings from his PDC F-1 dated March 12, 2012. Thank you.



Bob Bennett

cc: King County Prosecutor Dan Satterburg (R)  
Philip Stuzman, WA PDC

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Washington PDC  
PO Box 40908  
Olympia, WA 98504

**OCT 10 2012**  
**Public Disclosure Commission**

October 5, 2012

PDC:

I was reading the newspaper and talking to friends the other day and I came across some unusual statements by a candidate for state auditor, James Watkins. Watkins told two newspapers (The Vancouver Columbian & The Seattle Times) that he was going to take a "huge pay cut to serve as state auditor because he makes over three times what the state auditor" makes. The state auditor makes about \$116,000.

I got a copy of James Watkins F-1, dated March 12, 2012. Watkin's PDC says he makes between \$40,000 and \$99,000 from Business Development Experts LLC. And it says he makes between \$20,000 and \$39,999 from Redmond Strategy Group LLC. But Watkins incorporated his business on February 27, 2012, the day before he announced his campaign for state auditor at the 45<sup>th</sup> LD Republican Club in a Redmond church on February 28, 2012. Watkins then filed his F-1 & F-1 Supplement on March 12, 2012. Did Watkins really make between \$20,000 and \$39,999 in the 14 days between February 27<sup>th</sup> and March 12<sup>th</sup>? If not, he has falsified his PDC report.

This all made me a little suspect of his F-1 filing, so I looked at his investments. He lists a USAA cash value life insurance policy worth more than \$100,000, investments at Fidelity worth more than \$100,000, a 401(k) account at USAA worth between \$40,000 and \$99,999, and a 401 (k) account at Thomon Reuters worth between \$20,000 and \$39,999. But the accounts do NOT list a single investment. Not a single stock, mutual fund or property is listed. The whole point of the disclosure is for the public to be aware of where a conflict of interest might be present and thus, they should know what type of investments an elected official owns. Watkins says he has hundreds of thousands of dollars of investments, but I have no idea if a single dollar is invested in gold bullion, the technology sector, tobacco companies, foreign companies, etc. This directly violates the PDC instructions on filling out the form. The public can not find out ANY investment Watkins owns.

I also thought it was also important to know to whom Watkins owes money. When I looked at his F-1, the loan he lists appears to be paid off. However, he does have another loan with another lender that is not disclosed anywhere to the PDC. This is disconcerting since he owes money to people the public doesn't know about.

If Watkins is lying to the PDC, please prosecute him for perjury, since he signed his F-1 under oath. Please review his tax returns on file with the government to find out what is true. This is important. The public deserves to know whom Watkins is indebted to and the public does not deserve to be lied to again by Watkins.

This type of deceptive practice used by Watkins repeatedly erodes the confidence we have in government. Please take appropriate action and prosecute him immediately to restore our trust in government.



Bob Bennett

- stocks, bonds, securities, commodities (list each holding separately if worth over \$2,000 at any time during the reporting period; it's insufficient simply to identify the brokerage house)
- employer retirement system account (if you or a family member paid into an employer-sponsored retirement system, that retirement account is a reportable asset)
- stock options held during the reporting period but not yet exercised - report the value at grant date or describe number of shares for which you hold option;
- stock options exercised during the reporting period – report the value as income received;
- IRA (if investor managed, list each holding worth over \$2,000; if managed by an agent, list name of manager or management company that decides how IRA money is invested)
- money market accounts (if investor managed, list each holding worth over \$2,000; if managed by an agent, list name of manager or management company that decides how money is invested)
- businesses in which you or your family had less than a 10% ownership interest (if 10% or more, file F-1 Supplement)
- loans owed you or an immediate family member by individuals, candidates, political committees, businesses, associations, churches, etc. (Do not include accounts receivable due in the normal course of business)
- legal judgments due you or your family

For each item listed, you are requested to provide a description, a value code (the highest value during the period) and, if appropriate, an income amount code. Instead of a value code, you may list the highest number of shares held during the reporting period for stocks, bonds, and securities. Addresses for security holdings traded on a major exchange are not required.

Note: Each stock, bond and other intangible asset holding worth over \$2,000 at any time during the reporting period, whether held for the entire reporting period or just a portion of it, must be reported in this section. If you sold an intangible asset during the period, simply select the code amount that reflects the sale price plus any other interest or dividend income generated by the asset and put that code in the Income Amount column.

3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS		List bank and savings accounts, insurance policies, stock, bonds and other intangible property (including but not limited to stock options) held during the reporting period.	
A. Name and address of each bank or financial institution in which you, a family member, including registered domestic partner, had an account over \$25,000 any time during the report period.	Type of Account or Description of Asset	Asset Value (Use Code)	Income Amount (Use Code)
Watertown S&L, 508 Grand Ave., Watertown Watertown Mutual, 82 3 <sup>rd</sup> St., Watertown	Savings account Certificate of Deposit	D C	A A
B. Name and address of each insurance company where you, a family member, including registered domestic partner, had a policy with a cash or loan value over \$20,000 during the period. Fidelity Insurance Co 1121 Sunshine Blvd., Anchorage AK 99599	Whole life & variable annuity	D	A
C. Name and address of each company, association, government agency, etc. in which you, a family member, including registered domestic partner, owned or had a financial interest worth over \$2,000. include stocks, bonds, ownership, retirement plan, IRA, notes, stock options, and other intangible property if you, your spouse, registered domestic partner and/or dependents had decision-making authority regarding individual assets/investments list each asset or investment, the value and any income amount. EXAMPLE: if you self-directed an investment account identify each stock or other asset in that account. John Doe Trust (managed by Watertown Mutual) ABC Corporation, New York XYZ Company, Local City Gamers inc. Public Emp. Retirement System Veterans Administration Best Brokerage House	Blue chip stock trust Stock Stock Stock options exercised TRS account Military Retirement IRA account (managed by agent)	E 20 shrs 50 shrs 15 shrs E E E D	C B C A None C None

Itemize the holdings (e.g., individual stocks, securities, mutual funds, etc.) of investment accounts if you make the buy and sell decisions for the account.

Check here  if continues on attached sheet.

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OCT 10 2012

Public Disclosure Commission

**Washington State Public Disclosure Commission**  
Personal Financial Affairs Statement  
Reporting Modification Application Questionnaire, Instructions And Certification  
August 2007

**Application Questionnaire Instructions**

The purpose of the Public Disclosure Act in chapter RCW 42.17A includes at RCW 42.17A.001(3):

*"That the people shall be assured that the private financial dealings of their public officials, and of candidates for those offices, present no conflict of interest between the public trust and private interest."*

The form for providing disclosures of financial affairs is the F-1 Personal Financial Affairs Statement. The Act also provides for a process to seek a modification or suspension of reporting some information. RCW 42.17A.120(10) states in part:

*"After hearing, by order approved and ratified by a majority of the membership of the commission, [the commission is empowered to] suspend or modify any of the reporting requirements of this chapter in a particular case if it finds that literal application of this chapter works a **manifestly unreasonable hardship** and if it also finds that the suspension or modification will not **frustrate the purposes of the chapter...***

*... Any suspension or modification shall be only to the extent necessary to substantially relieve the hardship. The commission shall act to suspend or modify any reporting requirements only if it determines that facts exist that are clear and convincing proof of the findings required under this section." (Emphasis added).*

Possible qualifications for modifications or suspensions (referred to collectively as "modifications") are found at RCW 42.17A.120(10) and WAC 390-28-100. Copies of these provisions and reporting requirements are on the PDC's website at [www.pdc.wa.gov](http://www.pdc.wa.gov) under "Laws and Rules." The *Personal Financial Affairs Statement Instruction Manual* is also available on the website, under "Filer Resources – Manuals and Brochures." The Commission has also adopted Interpretations addressing modifications for certain professions and situations, and those are also available under "Laws and Rules" then "Interpretations." Modifications, if granted by the Commission, cover only one reporting period. Another application must be made in the following years if you still need a modification.

PDC staff has implemented this application procedure for filers requesting an F-1 Reporting Modification from the Commission. This is designed to provide more uniform information to the Commission from filers seeking a modification, and to enable a quicker response to possible questions about a request from the Commission at the hearing. **Please fill out this Application Questionnaire prior to having a modification request taken to the full Commission for consideration.** The blanks in this document will expand to accommodate your answers. **It is suggested that you review this entire Application Questionnaire first, before filling out your answers.**

- If you are requesting a modification, whether new or a renewal of an earlier request, please: (1) complete or review your filed Personal Financial Affairs Statement (PDC Form F-1) including Supplemental attachments; (2) answer all questions (# 1 – # 8) on this Application Questionnaire, unless otherwise directed below, (3) sign the Certification if you do not intend to be present at the Commission hearing on your modification request, and (4) return this Application Questionnaire to the PDC via e-mail, mail, fax or other delivery (and also send the original of the Certification to the PDC).

- Please note, however, that while this Application Questionnaire for filers seeking a modification can be returned to the PDC in several ways, F-1 forms cannot be filed by fax or e-mail. See filing instructions in

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SEARCH

Corporations and Charities Division

Public Disclosure Commission

Corporations Home Nonprofit Home Charities Home Awards Public Notices Contact Info

Search Results

Viewing 1 - 1 of 1 results for "redmond strategy group"

REDMOND STRATEGY GROUP LLC

REDMOND STRATEGY GROUP, LLC

UBI Number	603184652
Category	LLC
Active/Inactive	Active
State of Incorporation	WA
WA Filing Date	02/27/2012
Expiration Date	02/28/2013
Inactive Date	
Duration	Perpetual

Registered Agent Information

Agent Name	James Watkins
Address	13124 184th AVE NE
City	REDMOND
State	WA
ZIP	98052

Special Address Information

Address  
City  
State  
Zip

[View Additional Information »](#)

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Neither the State of Washington nor any agency, officer, or employee of the State of Washington warrants the accuracy, reliability, or timeliness of any information in the Public Access System and shall not be liable for any losses caused by such reliance on the accuracy, reliability, or timeliness of such information. While every effort is made to ensure the accuracy of this information, portions may be incorrect or not current. Any person or entity who relies on information obtained from the System does so at his or her own risk.

All documents filed with the Corporations Division are considered public record.



Refer to instruction manual for detailed assistance and examples.  <b>Deadlines:</b> Incumbent elected and appointed officials -- by April 15. Candidates and others -- within two weeks of becoming a candidate or being newly appointed to a position.  <b>SEND REPORT TO PUBLIC DISCLOSURE COMMISSION</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">DOLLAR CODE</th> <th style="text-align: left;">AMOUNT</th> </tr> <tr> <td>A</td> <td>\$1 to \$3,999</td> </tr> <tr> <td>B</td> <td>\$4,000 to \$19,999</td> </tr> <tr> <td>C</td> <td>\$20,000 to \$39,999</td> </tr> <tr> <td>D</td> <td>\$40,000 to \$99,999</td> </tr> <tr> <td>E</td> <td>\$100,000 or more</td> </tr> </table>	DOLLAR CODE	AMOUNT	A	\$1 to \$3,999	B	\$4,000 to \$19,999	C	\$20,000 to \$39,999	D	\$40,000 to \$99,999	E	\$100,000 or more	
DOLLAR CODE	AMOUNT													
A	\$1 to \$3,999													
B	\$4,000 to \$19,999													
C	\$20,000 to \$39,999													
D	\$40,000 to \$99,999													
E	\$100,000 or more													

Last Name WATKINS	First JAMES	Middle Initial H	Names of immediate family members, including registered domestic partner. If there is no reportable information to disclose for dependent children, or other dependents living in your household, do not identify them. Do identify your spouse or registered domestic partner. See F-1 manual for details.
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Mailing Address (Use PO Box or Work Address) PO BOX 2213	Ashley Watkins SP
City KIRKLAND	County KING
Zip + 4 98083	

Filing Status (Check only one box.) <input type="checkbox"/> An elected or state appointed official filing annual report <input type="checkbox"/> Final report as an elected official. Term expired: _____ <input checked="" type="checkbox"/> Candidate running in an election: month <u>NOV</u> year <u>2012</u> <input type="checkbox"/> Newly appointed to an elective office <input type="checkbox"/> Newly appointed to a state appointive office <input type="checkbox"/> Professional staff of the Governor's Office and the Legislature	Office Held or Sought Office title: <u>STATE AUDITOR</u> County, city, district or agency of the office, name and number: <u>AUDITOR, OFFICE OF STATE</u> Position number: <u>N/</u> Term begins: <u>01-07-2013</u> ends: <u>01-09-2017</u>
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<b>1</b>	<b>INCOME</b>	List each employer, or other source of income (pension, social security, legal judgment, etc.) from which you or a family member, including registered domestic partner, received \$2,000 or more during the period. (Report interest and dividends in Item 3 on reverse)		
Show Self (S) Spouse (SP/DP) Dependent (D)	Name and Address of Employer or Source of Compensation	Occupation or How Compensation Was Earned	Amount: (Use Code)	
S	Business Development Experts LLC 7205 Moon Valley Road SE NORTH BEND WA 98045	Management Consulting	D	
S	Redmond Strategy Group LLC 13124 184th AVE NE REDMOND WA 98052	Management Consulting	C	
Check Here <input checked="" type="checkbox"/> if continued on attached sheet				

<b>2</b>	<b>REAL ESTATE</b>	List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$10,000 in which you or a family member, including registered domestic partner, held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)		
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Property Sold or Interest Divested	Assessed Value (Use Code)	Name and Address of Purchaser	Nature and Amount (Use Code) of Payment or Consideration Received		
Property Purchased or Interest Acquired		Creditor's Name/Address	Payment Terms	Security Given	Mortgage Amount - (Use Code) Original   Current
All Other Property Entirely or Partially Owned King County; 13124 184th AVE NE Check here <input type="checkbox"/> if continued on attached sheet	E	Everhome Jacksonville FL	30 year Fixed	Mortgage	E   E



**INCOME CONTINUED**

**F-1**

Name **WATKINS, JAMES H**

Page **3**

**1**

**INCOME**

Show Self (S)  
Spouse (SP)  
Dependent (D)

Name and Address of Employer or Source of Compensation

Occupation or How Compensation  
Was Earned

Amount:  
(Use Code)

SP

Qinetiq North America  
7918 Jones Branch Road  
MCLEAN VA 22102

Technical Recruiter

E

Check Here  if continued on attached sheet

**FINANCIAL INSTITUTIONS CONTINUED**

**F-1**

Name WATKINS, JAMES H

Page 4

**3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS**

A. Name and address of each bank or financial institution	Type of Account or Description of Asset	Asset Value (Use Code)	Income Amount (Use Code)
Banner Bank 7950 164th AVE Redmond WA 98052	Checking	C	A

Check here  if continued on attached sheet.

**COMPANY, ASSOC., GOVERNMENT AGENCY CONTINUED**

**F-1**

Name WATKINS, JAMES H

Page 5

**3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS**

C. Name and address of each company, association, government agency	Type of Account or Description of Asset	Asset Value (Use Code)	Income Amount (Use Code)
USAA 9800 Fredericksburg Rd San Antonio TX	401 (K)	D	A
Thomson Reuters Savings Plan One Station Place Stamford CT	401 (K)	C	A
Mobile Solutions Holdings LLC 2018 156th AVE NE Bellevue WA	50,000 Founders Shares, pre-IPO. Face Value .01	A	0

Check here  if continued on attached sheet.



**PUBLIC DISCLOSURE COMMISSION**

711 CAPITOL WAY RM 206  
PO BOX 40908  
OLYMPIA WA 98504-0908  
(360) 753-1111  
TOLL FREE 1-877-601-2828  
EMAIL: pdc@pdc.wa.gov

**PDC FORM**  
**F-1**  
**SUPPLEMENT**  
**(1/12)**

100456049

**SUPPLEMENT PAGE**  
**PERSONAL FINANCIAL AFFAIRS STATEMENT**

03-14-2012

**PROVIDE INFORMATION FOR YOURSELF, SPOUSE, REGISTERED DOMESTIC PARTNER, DEPENDENT CHILDREN AND OTHER DEPENDENTS IN YOUR HOUSEHOLD**

Last Name WATKINS	First JAMES	Middle Initial H	DATE 2012-03-12
----------------------	----------------	---------------------	--------------------

**A**

**OFFICE HELD, BUSINESS INTERESTS:**

Provide the following information if, during the reporting period, you, your spouse, registered domestic partner or dependents

- (1) were an officer, director, general partner, trustee, or 10 percent or more owner of a corporation, non-profit organization, union, partnership, joint venture or other entity; and/or
  - (2) were a partner or member of a limited partnership, limited liability partnership, limited liability company or similar entity, including but not limited to a professional limited liability company.
- Legal Name: Report name used on legal documents establishing the entity.
  - Trade or Operating Name: Report name used for business purposes if different from the legal name.
  - Position or Percent of Ownership: The office, title and/or percent of ownership held.
  - Brief Description of the Business/Organization: Report the purpose, product(s), and/or the service(s) rendered.
  - Payments from Governmental Unit: If the governmental unit in which you hold or seek office made payments to the business entity concerning which you're reporting, show the purpose of each payment and the actual amount received.
  - Payments from Business Customers and Other Government Agencies: List each corporation, partnership, joint venture, sole proprietorship, union, association, business or other commercial entity and each government agency (other than the one you seek/hold office) which paid compensation of \$10,000 or more during the period to the entity. Briefly say what property, goods, services or other consideration was given or performed for the compensation.
  - Washington Real Estate: Identify real estate owned by the business entity if the qualifications referenced below are met.

**ENTITY NO. 1**

Reporting For: Self  Spouse   
Registered Domestic Partner  Dependent

**LEGAL NAME:**

Redmond Strategy Group LLC

**POSITION OR PERCENT OF OWNERSHIP**

100%

**TRADE OR OPERATING NAME:**

same

**ADDRESS:**

13124 184th AVE NE

Redmond

WA 98052

**BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:**

Consulting Services (Performance Audits, Management Consulting, Strategic Consulting)

**PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:**

Purpose of payments

Amount (actual dollars)  
\$

**PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$10,000 OR MORE:**

Agency name:

Purpose of payment (amount not required)

**PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$10,000 OR MORE**

Customer name:

Intellectual Ventures

Purpose of payment (amount not required)  
Payment for Consulting

**WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$20,000. List street address, assessor parcel number, or legal description and county for each parcel):**

None

Check here  if continued on attached sheet

**CONTINUE PARTS B AND C ON NEXT PAGES**

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After an initial conversation and preliminary evaluation, and if both parties are in agreement, we'll outline the purchase process in detail. A deal manager will guide the patent asset sale to completion through the assessment, valuation, and negotiation stages. The deal manager will also share the anticipated timeframes to close. Rest assured, if your asset is a good fit for the Intellectual Ventures portfolio, we want to move as quickly as you do. And, if at any point during the transaction you have questions or concerns, a deal manager and support team are just a call away.

## Tony Perkins

---

**From:** Tony Perkins  
**Sent:** Monday, November 05, 2012 10:02 AM  
**To:** 'bobbennett33@msn.com'  
**Subject:** Citizen action complaint against James Watkins

Dear Mr. Bennett,

I am the PDC staff investigator assigned to work on the Citizen Action Letter complaint that you filed against James Watkins. I have a couple of questions for you to facilitate our investigation.

1. Can you provide a copy of either the Vancouver *Columbian* or Seattle *Times* articles you refer to in your complaint, containing statements by James Watkins regarding his income? If the articles are available online and you can provide a link, that would be just as useful.
2. Can you provide more detail about the alleged loan that Mr. Watkins has with another lender, that you allege he failed to disclose? Please provide as much detail as you can. If you obtained the information from financial records, news reports, or another source, please describe the source and provide copies of any documents you possess.

I may have additional questions for you as our investigation progresses, but if you could respond to the above in the next two days, I would greatly appreciate it.

Sincerely,

## Tony Perkins

Lead Political Finance Specialist  
Washington State Public Disclosure Commission

☎ (360) 586-1042

☎ (360) 753-1112

✉ [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov)

DATE FILED PDC

OCT 25 2012

October 26, 2012

James Watkins  
PO Box 2213  
Kirkland, WA 98083

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To Whom it May Concern:

OCT 29 2012

Public Disclosure Commission

In response to the PDC complaint 13-018 filed October 5.

- 1) I am not aware of any newspaper article published as referred to in the complaint. I am unable to respond to phantom articles and conversations I'm not a party to.
- 2) My income is correct as stated on the PDC report.
- 3) I have reported my assets correctly as my treasurer and I understand the PDC requirements. I reported all my 'intangible assets' by institution as required – bank accounts, life insurance, mutual funds, and 401K's with values above \$2000. I also reported my family home and mortgage.
- 4) I correctly listed the only 2 loans I have outstanding on my PDC – my home mortgage and a loan for an RV. I'm not privy to how exactly Mr. Bennett has determined that a 'loan' is paid off, and another is outstanding, but I think my bankers will be surprised to hear that.
- 5) With respect to other debt, I have none.

As justification for his filing, Mr. Bennett is claiming phantom newspaper articles, vague 'conversations' that I'm not a party to, and loans that don't exist. This is a frivolous complaint with no basis in fact. I request the commission dismiss it forthwith.

Sincerely,



James Watkins

## Tony Perkins

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**From:** Tony Perkins  
**Sent:** Thursday, November 08, 2012 4:10 PM  
**To:** 'James Watkins'  
**Subject:** RE: PDC Case # 13-018

Dear Mr. Watkins,

This email is a follow-up to my voice message to you of a moment ago. PDC staff needs to make sure that the meaning of our questions is clear, so that we can confidently present your answers to the Commission. If after reviewing this email you would prefer to discuss my questions by telephone, please call me at the number below.

With mutual funds, we are not asking whether you have authority to choose individual stock holdings *within* a fund (e.g. Boeing), but rather whether you have the authority to choose which *funds* you invest in. (E.g., "Green Century Balanced," "Morgan Stanley European Equity," etc.)

Regarding 401(k) accounts, such plans typically allow an investor to choose from several basic options to make up their investment: money market accounts, stock mutual funds, bond mutual funds, etc. As PDC staff understands it, it's uncommon for investors to leave those basic choices up to the 401(k) administrator.

If by written contract you have delegated all of these choices to Fidelity Investments or your 401(k) administrators, we would like to see the contracts; please either scan and email them to this address, or send copies by fax to 360-753-1112. If you have not signed such contracts, then your March 14, 2012 F-1 needs to be amended to list in section 3c the funds and accounts that you owned or invested in during the reporting period. I would be happy to direct you to the PDC's filer assistance specialists for help with filing an amendment, if necessary.

Thank you again for your attention to this question. If I can clarify any of the above, please give me a call.

Sincerely,

## Tony Perkins

Lead Political Finance Specialist  
Washington State Public Disclosure Commission

☎ (360) 586-1042

☎ (360) 753-1112

✉ [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov)

---

**From:** James Watkins [<mailto:james@watkinsforauditor.com>]  
**Sent:** Thursday, November 08, 2012 3:06 PM  
**To:** Tony Perkins  
**Subject:** RE: PDC Case # 13-018

- 1) I have no decision making authority over the 401(k) or mutual funds.
- 2) No.
- 3) The 401 (k)'s and mutual funds do have contracts and management agreements.

---

**From:** Tony Perkins [<mailto:tony.perkins@pdc.wa.gov>]  
**Sent:** Thursday, November 08, 2012 2:59 PM  
**To:** James Watkins  
**Subject:** RE: PDC Case # 13-018

Dear Mr. Watkins,

Thank you for your response to the complaint in PDC Case 13-018. I have a few follow-up questions.

1. In section 3c of your March 14, 2012 F-1 filing, you list a 401(k) account and mutual funds held through Fidelity Investments, and 401(k) accounts held through USAA and Thomson Reuters. During the period covered by your report (March 12, 2011 through March 12, 2012), were all of these investments managed by professional investment managers?
2. At any point during the F-1 reporting period, did you make decisions about the specific mutual funds or other investment choices that were included in these plans?
3. If all of the 401(k) and mutual fund investments were broker-managed, was this pursuant to a written, signed contract through which you delegated all buying and selling authority? If so, do you possess copies of these contracts?

As you know, under [RCW 42.17A.765\(4\)](#) the PDC has limited time to take action on allegations made through a Citizen Action Letter, after which time the complainant may go to court in the name of the state. PDC staff would like to complete our investigation in a timely manner, so that we can make an appropriate recommendation to the Public Disclosure Commission, and allow the Commission the opportunity to act on the complaint. Accordingly, I would appreciate answers to the above questions by Tuesday, November 13, 2012.

Thanks for your attention to this. Please let me know if you have any questions before responding.

Sincerely,

## Tony Perkins

Lead Political Finance Specialist  
Washington State Public Disclosure Commission

 (360) 586-1042

 (360) 753-1112

 [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov)

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**From:** James Watkins [<mailto:james@watkinsforauditor.com>]

**Sent:** Friday, October 26, 2012 3:09 PM

**To:** Tony Perkins

**Subject:** PDC Case # 13-018

Mr. Perkins –

Attached is a pdf of my response to the above complaint. A signed hard copy has been mailed today and should arrive on Monday.

Regards,



James Watkins for WA State Auditor campaign  
(425) 390-4348



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# PDC Staff Telephone Record

*Tony Perkins*

Date: 11/09/2012 3:01PM

Duration: 0.03

Subject: 13-018

From: James Watkins

To: TPERKINS

Returned: N

Status:

Contact:

RE: my email.

He previously believed that because the managers of his mutual funds and his 401(k) plan administrators were responsible for buying and selling individual STOCKS held in the accounts, he was not required to provide more detail. He said that in fact, while he doesn't make these granular-level decisions, he does choose which funds he invests in (and several years ago, chose what funds and other investments would make up his 401[k]). He now understands that he needs to supply this information in section 3c of his F-1.

I suggested that he could supply the information in a memo submitted through the mail as an attachment to his F-1 -- a supplement rather than an amendment. He said he would do that by mid week next week, and would send an advance electronic copy.

RECEIVED

NOV 21 2012

Public Disclosure Commission

November 13, 2012

To Whom It May Concern:

Following is an addendum to my F1 as filed in 2012, detailing individual mutual funds.

**Fidelity Mutual Funds**

Fidelity Small Cap Discover Fund	E
Fidelity Capital Appreciation Fund	E
Fidelity Magellan Fund	E

**Fidelity 401K**

Artisan Mid Cap	D
FID Contrafund K	E
FID Growth Co K	E
Russell Intl Growth	D
Russell SM-Mid Cap	E
Russell Intl Value	D

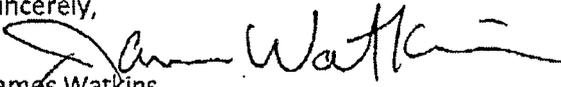
**Thomson 401K**

LifePath 2020 Fund T	C
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**USAA IRA**

USAA Capital Growth	C
USAA Science and Technology	C

Sincerely,

  
James Watkins