



House Republican

Organizational Committee

RECEIVED

OCT 22 2012

Public Disclosure Commission

ATTORNEY GENERAL
OF WASHINGTON

OCT 11 2012

GOVERNMENT COMPLIANCE
& ENFORCEMENT

Robert McKenna
Attorney General
State of Washington
Post Office Box 40100
Olympia, WA 98504-0100

Linda A. Dalton
Senior Assistant Attorney General
Government Compliance & Enforcement Division
Office of the Attorney General
Post Office Box 40100
Olympia, WA 98504-0100

Daniel Satterberg
King County Prosecuting Attorney
King County Courthouse, Room W554
516 Third Avenue
Seattle, WA 98104-2362

Dear Attorney General McKenna, Ms. Dalton, and Prosecutor Satterberg:

This letter – also known as a 45-day letter – is to notify you of my request to commence a civil action pursuant to RCW 42.17 in the name of the State of Washington against the 45th Legislative District Democrats for multiple violations of the Public Disclosure Act, including failure to timely file C3 Reports, failure to file timely C4 Reports and failure to file required accelerating reporting for both the 2012 Primary and General Elections.

By the terms of the Public Disclosure Commission's mission statement:

“The Public Disclosure Commission was created and empowered by Initiative of the People to provide timely and meaningful public access to accurate information about the financing of political campaigns, lobbyist expenditures, and the financial affairs of public officials and candidates, and to ensure compliance with and equitable enforcement of Washington's disclosure and campaign finance laws.”

Washington State citizens have absolute right to know the source of contributions and the expenditures being made to influence the direction of their vote.

RECEIVED

OCT 22 2012

Public Disclosure Commission

October 18, 2012
Page Two

The 45th District Democrats have made multiple contributions to 45th District Democratic candidate Roger Goodman without filing any C3 information on the source of those contributions.

The following contributions have been reported by candidate Roger Goodman's campaign for state representative:

<i>45th District Democrats</i>	<i>7/22/2012</i>	<i>\$4500 (Primary)</i>
<i>45th District Democrats</i>	<i>10/5/2012</i>	<i>\$4000 (General)</i>
<i>45th District Democrats</i>	<i>10/15/2012</i>	<i>\$13500 (General)</i>

In reviewing the information available to the public via the Public Disclosure Commission's website, the last filing by the 45th District was a C3 Report on 7/6/2012 (for which no C4 Report was ever filed).

Clearly, the 45th District Democrats are deliberately concealing both the sources of major contributions and the expenditure of same. Not just once, but a number of times. They have also failed to file expenditure reports both for these contributions and contributions received prior, as required by law.

An investigation into the source of these contributions and the failure to file, in any form, is immediately imperative. Concurrently, there must also be an investigation into the conspiracy that might stand behind it.

There are also additional questions about the complicity of candidate Roger Goodman in these contributions as they constitute a significant portion of the total revenue-to-date into his campaign. Given the significance, I wish to question candidate Goodman, under penalty of perjury, about his involvement in the solicitation and acceptance of these illegal contributions.

Given the size and scope of this potential conspiracy, I believe the felony penalty provisions of state campaign laws must be applied in order to prevent any other organization from so blatantly violating reporting requirements.

I look forward for the public's right to know being fully realized in this example of heinous and sordid actions by an organization attempting to subvert multiple laws and administrative policies.

Respectfully,



Kevin Carns
Political Director
House Republican Organizational Committee

RECEIVED

OCT 22 2012

Public Disclosure Commis...

**45-Day Letter Formal Complaint to the
Washington State Public Disclosure Commission,
Attorney General Rob McKenna and
King County Prosecutor Dan Satterberg
Relating to a Legislative District Party Committee
pursuant to RCW.42.17A.765(A)**

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 to the best of my knowledge.

Name of Committee: 45th District Democrats
Address of Committee: Post Office Box 2784
City of Committee: Redmond
State of Committee: Washington
Zip Code of Committee: 98073
Phone of Committee: 206-595-3013
Email of Committee: Treasurer@45thDems.org
Your Signature: 
Your Printed Name: Kevin Carns
Street Address: P.O. Box 7222
City, State and Zip Code: Olympia, WA 98507
Telephone Number: 360-870-5778
Date Signed: October 19, 2012
Place Signed (City and County): Olympia, Thurston