

# Schwerin Campbell Barnard Iglitzin & Lavitt LLP

ATTORNEYS AT LAW

*Of Counsel* Lawrence Schwerin

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*Sent via email to judyg@atg.wa.gov*

November 17, 2017

RECEIVED  
11/17/2017  
ATTORNEY GENERAL'S OFFICE  
Campaign Finance Unit

Bob Ferguson  
Attorney General  
Washington State Attorney General's Office  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100

RE: Notice of Violations of RCW 42.17A (Cowlitz County Republican Central Committee)  
SCBIL File No. 6552-021

Dear Mr. Ferguson:

On behalf of the Washington State Democratic Party, we write to notify you that there is good reason to believe several violations of the Fair Campaign Practices Act, RCW 42.17A et seq., have been committed by the Cowlitz County Republican Central Committee ("Respondent"). Please consider this our 45-day notice pursuant to RCW 42.17A.765(4).

This notice details several violations of Washington's campaign finance law committed by Respondent, as set forth below.

## **1) Failure to timely file accurate, timely C3 reports. (Violation of RCW 42.17A.235)**

State law requires that candidates and committees file frequent, accurate, and timely reports of financial and in-kind contributions. The Respondent failed on several occasions to do this. Additionally, they may have failed to timely deposit contributions within 5 business days. These violations are set forth in Exhibit A "Illegal Late Reported/Deposited Contributions by Cowlitz County Republican CC."

## **2) Failure to report occupation and employer information for donors over \$100. (Violation of RCW 42.17A.240, WAC 390-16-037)**

Washington's campaign finance law requires a campaign to report contributions received in a timely manner. The information required to be disclosed includes the name and address of the source of contributions that exceed \$25 in the aggregate, and the employer and occupation of

any individual contributor giving more than \$100 in the aggregate. The Respondents failed to include this information for at least one contribution as set forth below:

[Masters Ella 5/1/17 \\$240 Kelso, WA 98626](#)

### **3) Failure to list committee officers. (Violation of RCW 42.17A.205 (2)(c))**

The Respondents failed to list following individuals as officers ([detailed on their website](#)), as required by RCW42.17A.205(2)(c):

- Brad Thurman; Chairman
- Judy Green; Vice Chairperson
- Ronda Bowyer; State Committeewoman (falsely listed as Vice Chair)
- Sherrie Wilson; Secretary
- Pat Gurrad; Treasurer
- Rick Dahl; Director 19th Legislative District
- Scott Whittington; Director 20th Legislative District
- Beverly Little; President Republican Women

WAC 390-05-245 defines committee officer as: “..any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee.”

### **4) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 form. (Violation of RCW 42.17A.425)**

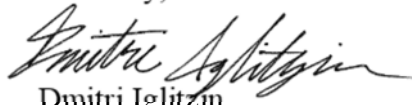
State law requires that, “No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form...” The above-named individuals, who were not listed as officers, were prohibited from making expenditures for the committee.

The laws regulating the reporting of campaign contributions serve a critical role in promoting transparency and ethical conduct in our elections. Respondents’ disregard for these laws show an unacceptable lack of commitment to the principles our campaign finance laws uphold.

Please be aware that if you do not initiate an action against Respondents within the applicable statutory notice periods, we intend to satisfy any applicable notice requirements and proceed with an action in the name of the State. Please do not hesitate to contact us if you have any questions.

Bob Ferguson  
November 17, 2017  
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Sincerely,

A handwritten signature in cursive script, appearing to read "Dmitri Iglitzin".

Dmitri Iglitzin  
*Counsel for Washington State Democrats*

Enclosures

cc: Linda Dalton, Assistant Attorney General  
Thurston County Prosecutor  
Pacific County Prosecutor

	A	B	C	D	E	F	G	H
1	<b>Exhibit A -- Illegal Late Reported/Deposited Contributions by Cowlitz County P</b>							
2								
3		<b>Contribution Date</b>	<b>Due Date (approximate)</b>	<b>Date reported</b>	<b>Dates Late (approximate)</b>	<b>Amount</b>	<b>Contributor Name</b>	<b>Report Number</b>
4	1	11/10/16	11/17/16	11/20/16	3	\$30	Charoleen Archer	<a href="#">100735549</a>
5	2	10/4/16	11/11/16	10/18/16	7	\$20	Proceeds from Low Cost	<a href="#">100728149</a>
6	3	8/23/16	8/30/16	9/12/16	13	\$60	Proceeds from Low Cost	<a href="#">100720262</a>
7	4	8/31/16	9/7/16	9/12/16	5	\$0.39	Miscellaneous Receipts	<a href="#">100720263</a>
8	5	7/30/16	8/7/16	8/15/16	8	\$0.48	Miscellaneous Receipts	<a href="#">100715879</a>
9	6	4/6/17	5/10/17	6/7/17	28	250	L.G. Isaacson Co.	<a href="#">100766547</a>
10	7	4/29/17	5/10/17	9/8/17	121	5,660	Multiple	<a href="#">100785844</a>
11	8	5/1/17	6/10/17	10/17/17	129	420	Multiple	<a href="#">100793591</a>
12	9	7/11/17	7/18/17	8/1/17	14	700	Multiple	<a href="#">100780323</a>
13	10	8/24/17	8/31/17	9/8/17	8	165	Multiple	<a href="#">100785845</a>
14	11	8/31/17	9/7/17	9/8/17	1	0.53	Bank Interest	<a href="#">100785848</a>
15	12	9/19/17	9/26/17	10/11/17	15	60	Pat Gurrad	<a href="#">100791856</a>