

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 (Joel Kretz)
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 State Representative Joel Kretz and Representative Kretz's authorized political committee (the "Respondents"). 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 Respondents, as set forth below.

Respondents filed several untimely C-4 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit A.

Respondents also failed to timely deposit contributions received pursuant to RCW 42.17A.220, as set forth in Exhibit B.

Further, Respondents filed several untimely C-3 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit C.

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.

Bob Ferguson
November 17, 2017
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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.

Sincerely,

A handwritten signature in black ink, appearing to read "Dmitri Iglitzin". The signature is fluid and cursive, written over the word "Sincerely,".

Dmitri Iglitzin

Counsel for Washington State Democrats

Enclosures

cc: Linda Dalton, Assistant Attorney General
Okanagan County Prosecutor
Stevens County Prosecutor
Thurston County Prosecutor
Pend-Oreille County Prosecutor
Ferry County Prosecutor

Exhibit A –Late Reported C4s

1. December 13, 2016 (form C-4 report, numbered **100738503**):

This report, for November 2016, was apparently due by December 12, 2016 and was one day late.

2. May 26, 2016 (form C-4 report, numbered **100696845**):

This report, for March 2016, was apparently due by April 10, 2016 and was submitted 46 days late.

3. May 27, 2016 (form C-4 report, numbered **100697096**):

This report, for April 2016, was apparently due by May 10, 2016, and was 17 days late.

Exhibit B -- Illegally Late Deposited Contributions

Violation #	Contribution date	Deposit Date	Deposit Due Date (approx.)	Dates Late (approx.)	Amount	Contributor
1	12/11/2015	12/21/2015	12/17/2015	4	\$950.00	NRA-Political Victory Fund
2	12/11/2015	12/21/2015	12/17/2015	4	\$500.00	WA Tree Fruit Assoc.
3	10/14/2015	1/4/2016	10/20/2015	76	\$250.00	WA Beef
4	5/16/2016	6/1/2016	5/21/2016	11	\$300.00	WA Fire Commissioners Assoc.
5	5/30/2016	6/20/2016	6/4/2016	16	\$500.00	WA Physical Therapy
6	6/1/2016	6/27/2016	6/7/2016	20	\$500.00	Premera Blue Cross
7	6/8/2016	6/27/2016	6/14/2016	13	\$1,000	Trucking Action Committee
8	6/14/2016	6/27/2016	6/20/2016	7	\$1,000.00	Council of Police Political
9	6/30/2016	7/13/2016	7/6/2016	7	\$400.00	Gun Owners Action League
10	6/24/2016	7/13/2016	6/30/2016	14	\$1,000.00	Samish Tyee
11	6/21/2016	7/13/2016	6/27/2016	16	\$650.00	BECU
12	6/9/2016	7/13/2016	6/16/2016	27	\$800.00	Altria Client Services
13	6/24/2016	7/13/2016	6/30/2016	14	\$1,000.00	Credit Union Legislative
14	6/24/2016	7/13/2016	6/30/2016	14	\$1,000.00	Credit Union Legislative
15	4/19/2016	7/13/2016	4/25/2016	79	\$950.00	PEMCO Mut. Ins. Co.
16	6/3/2016	7/13/2016	6/9/2016	34	\$1,000.00	STCU
17	6/13/2016	7/13/2016	6/18/2016	25	\$1,000.00	WA Multi Fam. H. Assoc.
18	7/6/2016	7/19/2016	7/12/2016	7	\$100.00	John May
19	6/10/2016	7/19/2016	6/16/2016	33	\$1,000.00	Cambia Health Solutions
20	6/22/2016	7/19/2016	6/28/2016	21	\$1,000.00	WA Auto Dealers
21	7/8/2016	7/19/2016	7/14/2016	5	\$1,000.00	Pawn 1, Inc.
22	6/22/2016	7/19/2016	6/28/2016	21	\$50.00	WA Auto Dealers
23	7/18/2016	8/1/2016	7/23/2016	9	\$50.00	WA Beer and Wine
24	7/18/2016	8/1/2016	7/23/2016	9	\$1,000.00	WA Beer and Wine

25	7/20/2016	8/1/2016	7/26/2016	6	\$500.00	PHRMA
26	7/18/2016	8/1/2016	7/23/2016	9	\$1,000.00	Anheuser Busch
27	7/19/2016	8/1/2016	7/25/2016	7	\$500.00	Millenium Bulk Terminal
28	5/10/2016	8/1/2016	5/16/2016	77	\$1,000.00	Rayonier
29	7/18/2016	8/1/2016	7/23/2016	9	\$1,000.00	BNSF Railway Co.
30	7/18/2016	8/1/2016	7/23/2016	9	\$1,000.00	BNSF Railway Co.
31	7/21/2016	8/1/2016	7/27/2016	5	\$250.00	Jerry Elrod
32	7/12/2016	8/1/2016	7/18/2016	14	\$1,000.00	Centene Mngmnt. Co.
33	6/9/2016	8/1/2016	6/15/2016	47	\$500.00	Port Blakely Tree Farms
34	7/25/2016	8/1/2016	7/30/2016	2	\$1,000.00	Southern Glazer's Wine
35	7/25/2016	8/1/2016	7/30/2016	2	\$1,000.00	Southern Glazer's Wine
36	7/13/2016	8/1/2016	7/19/2016	13	\$1,000.00	Potato PAC
37	6/9/2016	8/1/2016	6/15/2016	47	\$1,000.00	WHPAC
38	7/25/2016	8/1/2016	7/30/2016	2	\$400.00	WA Dairy PAC
39	7/22/2016	8/1/2016	7/28/2016	4	\$750.00	Puget Sound Pilots PAC
40	6/28/2016	8/1/2016	7/4/2016	28	\$250.00	Fresenius Management Svs.
41	6/29/2016	8/1/2016	7/5/2016	27	\$300.00	Olympic Resource MGMT
42	7/13/2016	8/10/2016	7/19/2016	22	\$1,000.00	Sabey Corp.
43	7/27/2016	8/10/2016	8/2/2016	8	\$500.00	Pallyup Tribe
44	7/27/2016	8/10/2016	8/2/2016	8	\$50.00	Microsoft
45	7/27/2016	8/10/2016	8/2/2016	8	\$950.00	Microsoft
46	7/21/2016	8/20/2016	7/27/2016	14	\$50.00	Delta Dental
47	7/21/2016	8/10/2016	7/27/2016	14	\$1,000.00	Delta Dental
48	6/9/2016	8/10/2016	6/15/2016	56	\$1,000.00	WHPAC
49	7/26/2016	8/10/2016	8/1/2016	9	\$1,000.00	WASHBANK PAC
50	7/21/2016	8/10/2016	7/27/2016	14	\$50.00	The Boeing Company PAC
51	7/21/2016	8/10/2016	7/27/2016	14	\$950.00	The Boeing Company PAC
52	6/30/2016	8/22/2016	7/6/2016	47	\$500.00	Walgreen Co.
53	7/22/2016	8/22/2016	7/28/2016	25	\$950.00	WA Society of CPAs
54	7/5/2016	8/22/2016	7/11/2016	42	\$500.00	Alliance of Automobile
55	8/3/2016	8/22/2016	8/9/2016	13	\$100.00	Donald Thomason
56	8/17/2016	9/12/2016	8/23/2016	20	\$100.00	WA East Asian Medicine Assn.
57	9/1/2016	9/14/2016	9/7/2016	7	\$1,000.00	WHCA PAC
58	8/31/2016	9/21/2016	9/6/2016	15	\$1,000.00	Council of Police Political

59	6/10/2016	9/26/2016	6/16/2016	102	\$500.00	WSVMA-PAC
60	8/25/2016	9/26/2016	8/31/2016	27	\$500.00	Friends of WSU
61	8/24/2016	9/26/2016	8/30/2016	28	\$1,000.00	Our patients come first PAC
62	8/25/2016	9/26/2016	8/31/2016	27	\$1,000.00	Physicians EYEPAC
63	8/9/2016	9/26/2016	8/15/2016	42	\$1,000.00	WA Assoc. of ???
64	8/30/2016	9/26/2016	9/5/2016	21	\$1,000.00	NRA-Political Victory Fund
65	9/14/2016	10/10/2016	9/20/2016	20	\$100.00	Spokane Cnty. Republican
66	9/27/2016	10/10/2016	10/3/2016	7	\$500.00	WA Assoc. of ???
67	9/20/2016	10/10/2016	9/26/2016	14	\$100.00	WSPMA-PODPAC
68	7/7/2016	10/19/2016	7/13/2016	98	\$950.00	AT&T
69	9/19/2016	10/19/2016	9/24/2016	25	\$1,000.00	WA Oil Marketers
70	9/25/2016	10/19/2016	9/30/2016	19	\$1,000.00	Seattle Mariners
71	10/11/2016	10/24/2016	10/17/2016	7	\$100.00	Public Utility Dist.
72	9/23/2016	10/24/2016	9/29/2016	25	\$1,000.00	Ash Grove Cement Co.
73	9/15/2016	10/24/2016	9/21/2016	33	\$500.00	WA Chapter American College Of ???
74	9/1/2016	10/24/2016	9/7/2016	47	\$500.00	MACPAC
75	9/6/2016	10/24/2016	9/12/2016	42	\$1,000.00	WA Forest Protection
76	10/10/2016	10/24/2016	10/15/2016	9	\$1,000.00	BP North America Empl. PAC
77	7/22/2016	10/24/2016	7/28/2016	88	\$1,000.00	Avista Corp
78	8/18/2016	10/24/2016	8/24/2016	61	\$100.00	United Psychologist PAC
79	9/14/2016	10/24/2016	9/20/2016	34	\$250.00	K12 Management
80	9/28/2016	10/24/2016	10/4/2016	20	\$500.00	NACDS
81	8/5/2016	10/24/2016	8/11/2016	74	\$750.00	Charter Communications
82	10/5/2016	10/24/2016	10/11/2016	6	\$250.00	Strategies 360 Inc.
83	7/29/2016	10/24/2016	8/4/2016	81	\$500.00	T Mobile
84	10/11/2016	11/2/2016	10/17/2016	16	\$1,000.00	Centene Management Co.
85	10/14/2016	11/2/2016	10/20/2016	13	\$250.00	Waste Connections, Inc.
86	10/18/2016	11/2/2016	10/24/2016	9	\$250.00	Consumer Fireworks Safety
87	10/27/2016	11/7/2016	11/2/2016	5	\$500.00	Aerospace Futures Alliance
88	10/27/2016	11/7/2016	11/2/2016	5	\$500.00	Cedar Grove Composting
89	8/23/2016	11/7/2016	8/29/2016	70	\$500.00	WA Optometric PAC
90	10/27/2016	11/7/2016	11/2/2016	5	\$500.00	Vulcan Inc.
91	9/14/2016	11/7/2016	9/20/2016	54	\$500.00	Eli Lily
92	11/7/2016	11/16/2016	11/12/2016	4	\$1,000.00	Amerigroup Corp.

93	11/7/2016	11/16/2016	11/12/2016	4	\$1,000.00	WA Chiropractic Trust
94	11/7/2016	11/16/2016	11/12/2016	4	\$300.00	Basin Disposal
95	11/7/2016	11/16/2016	11/12/2016	4	\$150.00	K&L Gates Continuing PAC
96	11/8/2016	11/22/2016	11/14/2016	8	\$50.00	James Prince
97	11/8/2016	11/22/2016	11/14/2016	8	\$250.00	Richard Larson
98	11/8/2016	11/22/2016	11/14/2016	8	\$12.50	Myrna Hughes
99	11/8/2016	11/22/2016	11/14/2016	8	\$50.00	Myrna Hughes
100	11/8/2016	11/22/2016	11/14/2016	8	\$125.00	Ray Campbell
101	11/8/2016	11/22/2016	11/14/2016	8	\$50.00	Julie Buchert
102	11/8/2016	11/22/2016	11/14/2016	8	\$50.00	Steven Houston
103	11/8/2016	11/22/2016	11/14/2016	8	\$50.00	Deanna Kalmus-Houston
104	11/8/2016	11/22/2016	11/14/2016	8	\$112.50	Todd McDaniel
105	11/8/2016	11/22/2016	11/14/2016	8	\$112.50	Teresa McDaniel
106	8/15/2016	12/12/2016	8/21/2016	113	\$700.00	WA Electric Cooperative PAC
107	10/6/2016	12/19/2016	10/13/2016	67	\$500.00	WA Consumer Finance Edu.
108	12/8/2016	1/2/2017	12/14/2016	19	\$500.00	American Rental Assoc.
109	12/8/2016	1/2/2017	12/14/2016	19	\$1,000.00	Public School Emps. Of

	A	B	C	D	E	F	G
1	Exhibit C -- Illegally Late Reported Contributions						
2							
3	Violation #	Contribution_date	Report Due Date (approx.)	Date Reported	Dates Late (approx.)	Amount	Contributor
4	1	1/21/2016	2/10/2016	1/27/2017		\$27.00	EWBANK CURTIS