

*Schwerin Campbell Barnard Iglitzin & Lavitt LLP*

ATTORNEYS AT LAW

*Of Counsel* Lawrence Schwerin

DMITRI IGLITZIN  
*iglitzin@workerlaw.com*

**Sent via email to [judyg@atg.wa.gov](mailto: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 (Terry Nealey)  
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 Terry Nealey and Representative Nealey'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  
Page 2 of 2

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, with the first name "Dmitri" being more prominent and the last name "Iglitzin" following in a similar style.

Dmitri Iglitzin  
*Counsel for Washington State Democrats*

Enclosures

cc: Linda Dalton, Assistant Attorney General  
Thurston County Prosecutor  
Benton County Prosecutor  
Columbia County Prosecutor  
Walla Walla County Prosecutor  
Franklin County Prosecutor

**Exhibit A Nealy – Late C4s**

**1. November 30, 2015, form C-4 report(s) 100669063**

This report, for the October 2015 filing period, was apparently due by November 10, 2015.

	A	B	C	D	E	F	G
1	<b>Exhibit B -- Illegally Late Deposited Contributions</b>						
2							
3		<b>Report Number</b>	<b>Deposit Date</b>	<b>Number of late Deposits</b>	<b>Total \$ late reported</b>		
4	1	100738823	12/8/2016	1	\$100.00		

	A	B	C	D	E	F	G
1	<b>Exhibit C -- Illegally Late Reported C3s</b>						
2							
3	<b>Violation #</b>	<b>Report #</b>	<b>Deposit Date</b>	<b>Report Due Date</b>	<b>Date Reported</b>	<b>Dates Late (approx.)</b>	<b>Amount of Deposit</b>
4	1	100711020	7/21/2016	7/25/2016	7/26/2016	1	\$550.00
5	2	100721031	9/7/2016	9/12/2016	9/13/2016	1	\$140.00
6	3	100721033	9/7/2016	9/12/2016	9/13/2016	1	\$25.00
7	4	100734520	10/7/2016	10/10/2016	11/7/2016	27	\$750.00
8	<b>Total</b>					30	\$1,465.00