



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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September 23, 2016

The Honorable Robert Ferguson
Attorney General
1125 Washington St SE
PO Box 40100
Olympia, WA 98504-0100

RE: Washington State Public Disclosure Commission Recommendation Following Staff
Investigation re: Cindy Larsen, PDC Case No. 6928

Dear Attorney General Ferguson:

This letter concerns a 45-Day Citizen Action Complaint filed with the Washington State Attorney General and Snohomish County Prosecutor on August 21, 2016 by Robert Schiffner. The Complaint, which alleged violations of RCW 42.17A by Cindy Larsen, was also copied to Public Disclosure Commission staff. Staff investigated Mr. Schiffner's allegations together with two prior public complaints containing similar allegations against Ms. Larsen, the first filed with the Public Disclosure Commission on July 25, 2016 by Beth Lucas, and the second filed on August 4, 2016 by Melissa Day. The Complaints alleged that the political committee A Safer Snohomish County sponsored a mailing to promote Snohomish County Proposition 1 in the August 4, 2016 primary election, and that this mailing assisted the campaign of Cindy Larsen for Snohomish County Superior Court Judge by identifying Ms. Larsen by name and through two photographs. The Complaints alleged that Ms. Larsen failed to disclose A Safer Snohomish County's expenditures as in-kind contributions to her campaign, an alleged violation of RCW 42.17A.240.

PDC staff investigated the Complaints and prepared a Report of Investigation, Executive Summary, and Staff Analysis concerning the alleged violations by Cindy Larsen. The Commission considered the results of staff's investigation at the regular Commission meeting held on September 22, 2016, where staff presented its Executive Summary and Staff Analysis which included a recommendation regarding the allegations. A copy of the Executive Summary and Staff Analysis is enclosed with this letter.

Staff Conclusion

As noted in the attached Executive Summary and Staff Analysis, staff concluded that:

Cindy Larsen violated RCW 42.17A.240 by failing to disclose expenditures by A Safer Snohomish County for the committee's mailing as in-kind contributions in her PDC filings.

Staff concluded further that Ms. Larsen violated RCW 42.17A.410 by accepting in-kind contributions from A Safer Snohomish County that exceeded the \$2,000 primary election contribution limit for judicial races.

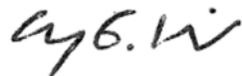
Commission Recommendation

By a unanimous vote, the Commission adopted a motion to return the 45-day Citizen Action Complaint to the Washington Attorney General with a recommendation to take action concerning Cindy Larsen. The Commission explained that this motion was based on the facts identified in staff's Report of Investigation, Executive Summary, and Staff Analysis, and a review of the relevant statutes.

The Commission unanimously adopted a second motion, expressing its intent to retain jurisdiction over aspects of this matter involving potential violations by A Safer Snohomish County, until the Washington Attorney General concludes an action concerning Ms. Larsen. At that time, the Commission may determine to proceed with an investigation concerning potential violations by A Safer Snohomish County.

If you have questions, please contact me at (360) 664-2735. Thank you.

Sincerely,



for

Evelyn Fielding Lopez
Executive Director

Enclosure

cc: Commissioners
Linda A. Dalton, Sr. Assistant Attorney General
Greg Wong, Pacifica Law Group, Counsel to Cindy Larsen
Beth Lucas
Melissa Day
Robert Schiffner