



# Smith & Dietrich Law Offices

## South Sound Community Lawyers

Smith & Dietrich  
Law Offices PLLC

September 13, 2017

Via Electronic Delivery

Members  
Walter Smith  
Steve Dietrich

B.G. Sandahl  
Public Disclosure Commission  
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400 Union Ave. SE  
Suite 200  
Olympia, WA 98501

Telephone  
(360) 918-7230

Re: *Nineteen PDC complaints filed September 1, 2017*

Dear Ms. Sandahl,

This letter is to confirm that I uploaded nineteen complaints to the Public Disclosure Commission on Friday, September 1, 2017 through the agency's web portal for complaint uploading, and that I ask the Commission staff to kindly treat those filings as complaints for purposes of the PDC's complaint resolution process.

As we discussed in a phone call this morning, the complaints generally cited to allegations of violations of Washington campaign finance laws recited in detail in letters I submitted to various county prosecuting attorneys and to the Attorney General on September 1. Copies of those letters were attached to my complaints uploaded to the PDC. While these allegations have been provided to the counties and to the Attorney General in the form of citizen action notices, the PDC has jurisdiction to consider the allegations as complaints at the same time. To be clear, I am asking that the PDC kindly treat the allegations as complaints for the PDC's own purposes, and take any action it deems appropriate.

The nineteen specific complaints I presented to the PDC on September 1 include the following:

### Candidates and authorized committees

- *Bruce [Chandler](#), State Representative (R-Zillah, 15th Leg. Dist., Yakima County) and the Bruce Chandler Campaign.*
  - \$60,000 contribution to House Republican Organizational Committee not reported as surplus funds expenditure; failure to report any contributions or expenditures for 2016 legislative race.
- *Mary [Dye](#), State Representative (R-Pomeroy, 9th Leg. Dist., Garfield County) and the Committee to Elect Mary Dye.*
  - \$24,000 contribution to House Republican Organizational Committee not reported as surplus funds expenditure; failure to organize or report for surplus funds account; failure to timely file/amend contribution and expenditure reporting.

- *Norman [Johnson](#), State Representative (R-Yakima, 14th Leg. Dist., Yakima County) and Norm Johnson for State Representative.*
  - \$3,000 contribution to House Republican Organizational Committee not reported as surplus funds expenditure and over \$1,000 donation to private organization from campaign funds; failure to report orders, debts, and obligations incurred during 2016 election campaign; failure to timely report campaign expenditures.
- *John [Koster](#), State Representative (R-Everett, 39th Leg. Dist., Snohomish County) and Elect John Koster, a political committee.*
  - \$10,000 contribution to House Republican Organizational Committee from campaign funds; failure to report orders, debts, and obligations incurred during 2016 election campaign; failure to timely report campaign contributions and expenditures.
- *Jami [Lund](#), Centralia School Board Member (Nonpartisan position, Centralia, Lewis County) and Citizens for Jami Lund.*
  - Failure to accurately and timely report campaign contributions and expenditures, and orders placed, debts, and obligations.
- *Drew MacEwen (I note this complaint has not yet been added to the PDC's Enforcement page), State Representative (R-Union, 35th Leg. Dist., Mason County) and Committee to Elect Drew MacEwen.*
  - \$5,000 contribution to House Republican Organizational Committee not reported as surplus funds expenditure and over \$600 in donations and contributions from candidate authorized committee funds; failure to accurately and timely report campaign contributions.
- *Mathew [Manweller](#), State Representative (R-Ellensburg, 13th Leg. Dist., Kittitas County) and Committee to Elect Matt Manweller.*
  - \$72,500 contribution to House Republican Organizational Committee from campaign funds; failure to accurately and timely report campaign expenditures and file statement of organization.
- *Gina [McCabe](#), State Representative (R-Goldendale, 14th Leg. Dist., Klickitat County) Committee to Elect Gina McCabe.*
  - \$20,000 contribution to House Republican Organizational Committee not reported as surplus funds expenditure and \$200 donation to private organization from campaign funds; failure to organize or report for surplus funds account; failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations.
- *Robert McCaslin (I note this complaint has not yet been added to the PDC's Enforcement page), State Representative (R-Spokane Valley, 4th Leg. Dist., Spokane County) and Committee to Elect Bob McCaslin.*
  - Failure to accurately and timely report campaign organization, contributions, and expenditures; \$10,000 contribution to House Republican Organizational Committee from campaign funds.

- *Kirk [Pearson](#), State Senator (R-Index, 39th Leg. Dist., Snohomish County) and Kirk Pearson for State Senate 2016, a political committee.*
  - Extraordinary volume of late reporting of campaign contributions and expenditures (a cumulative 11,870 days late).
- *Pam [Roach](#), Pierce County Councilmember (R-Sumner, Pierce County) and Friends of Pam Roach, a political committee.*
  - Failure to accurately and timely report campaign contributions and expenditures; failure to identify sub-vendors for expenditures.
- *Matthew [Shea](#), State Representative (R-Spokane Valley, 4th Leg. Dist., Spokane County) and Committee to Elect Matt Shea.*
  - Failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations; failure to identify sub-vendors for expenditures.
- *Norma [Smith](#), State Representative (R-Clinton, 10th Leg. Dist., Island County) and Friends of Norma Smith, a political committee.*
  - \$30,000 contribution to House Republican Organizational Committee from campaign funds.
- *Melanie [Stambaugh](#), State Representative (R-Puyallup, 25th Leg. Dist., Pierce County) and Friends of Melanie Stambaugh, a political committee.*
  - Failure to accurately and timely report campaign expenditures, orders, debts, and obligations.
- *David [Taylor](#), State Representative (R-Yakima, 15th Leg. Dist., Yakima County) and Committee to Elect David Taylor.*
  - Failure to accurately and timely report campaign contributions; over \$1,000 in donations to private organization from campaign funds.

#### County political party committees

- *[Clark](#) County Republican Central Committee (Vancouver).*
  - Failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations; acceptance of prohibited contributions from candidate authorized committees.
- *[Franklin](#) County Republican Central Committee (Pasco).*
  - Failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations.
- *[Snohomish](#) County Republican Central Committee (Marysville).*
  - Failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations.
- *[Spokane](#) County Republican Central Committee (Spokane).*
  - Failure to accurately and timely report campaign contributions, expenditures, orders, debts, and obligations; concealment of identity/payment amount for speaker's fee; acceptance of prohibited contributions from candidate authorized committees.

I understand that in the future, it would assist in your process for me to list the PDC, or perhaps yourself, as a recipient on page one of the letters I prepare to notify state authorities of violations of Washington campaign finance laws. Additionally, you requested that I specifically state in the body of the letters I submit that they present a complaint to the PDC to the extent I seek to use the letter to initiate a PDC complaint review process. I am happy to accommodate your requests going forward.

Please feel free to contact me with any question concerning the allegations I have made in my citizen action notices and PDC complaints.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter M. Smith". The signature is fluid and cursive, with a prominent "W" and "S".

Walter M. Smith