

STATE OF WASHINGTON PUBLIC DISCLOSURE COMMISSION

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Addendum to Investigative Review memorandum

Date:

November 2, 2016

To:

Public Disclosure Commission Members

From:

Kurt Young, PDC Compliance Officer

Subject:

45-Day Citizen Action Letter - Jared Karstetter (PDC Case 8642)

V. Staff Recommendation

A. Concealment:

Staff recommended in its initial memorandum that the Commission communicate to the Attorney General that within the limited investigative timeframe of the Citizen Action Letter, staff could not conclude that Jared Karstetter violated RCW 42.17A.435 by concealing contributions made by the King County Corrections Guild, and identifying himself as the source of the funds for the contribution.

As noted in the Memorandum, the evidence indicated that the candidates that received contributions made by Mr. Karstetter using his personal credit card and subsequently reimbursed by the King County Corrections Guild, incorrectly attributed the campaign contributions to Mr. Karstetter on the Monetary Contributions reports (C-3 reports).

PDC staff found no evidence the contributions had been <u>intentionally</u> concealed by Mr. Karstetter or the King County Corrections Guild, but that the true source of the contributions was in fact concealed.

After completing the Memorandum of Investigative Review, staff was informed by the Attorney General's Office that based on recent cases, the intent of the Respondent is not required for allegations concerning concealment. What is required is finding that concealment occurred. With that clarification, Mr. Karstetter and the King County Corrections Guild have committed apparent violations of RCW 42.17A.435.