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Washington Attorney General
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Jon Tunheim
Thurston County Prosecuting Attorney
2000 Lakeridge Drive S.W., Building 2
Olympia, WA 98502

Dear Messrs. Ferguson and Tunheim,

I write pursuant to RCW 42.17A.765(4) to report multiple violations of the Public Disclosure Act (“PDA”), RCW 42.17A, by the Washington State Association for Justice (“WSAJ”), and by Gerhard Letzing and Suone Cotner in their respective capacities as Executive Director and Deputy Director of WSAJ, respectively (“WSAJ officers”).

As a lobbyist employer, WSAJ violated RCW 42.17A.630 by failing to file legally required reports detailing its monetary and in-kind contributions to political committees. At least **\$160,984** worth of monetary expenditures by WSAJ remains unreported to the PDC. Further, WSAJ failed to file at least **\$1,467,387** of in-kind contributions to its continuing political committee as well as other political committees.

A. Violation of RCW 42.17A.630.

WSAJ violated, and continues to violate, RCW 42.17A.630. RCW 42.17A.630(2) requires a lobbyist employer to file monthly reports detailing its monetary and in-kind contributions totaling more than \$110 to candidates, elected officials, officers of public agencies, or political committees. Lobbyist employers are required to submit these monetary and in-kind contributions on either an “Employer of Lobbyist Monthly Political Contribution Report,” also known as an L-3c, or on its lobbyists’ L2 reports. WSAJ engages in lobbying activity and is therefore considered a lobbyist employer. The PDC lists WSAJ’s lobbyists’ L2 reports from 2009-2014. See **Exhibit 1**. As a lobbyist employer, WSAJ failed to file reports detailing its monetary and in-kind contributions to candidates, elected officials, officers, or political committees.

Unreported Monetary Contributions

Based on C3 reports filed by political committees and candidates from 2010-present, WSAJ contributed at least **\$160,984** to **candidates** and other **political committees**. See **Exhibit**

2. WSAJ reported none of these contributions on any L-3c or L-2 reports. Thus, WSAJ violated RCW 42.17A.630 by failing to report at least **\$160,984** in monetary contributions.

Unreported In-Kind Contributions

Additionally, the Washington State Association for Justice Justice for All PAC (“WSAJ PAC”), WSAJ’s own continuing political committee, reimbursed WSAJ for administration fees and professional services, indicating that WSAJ has made substantial, unreported in-kind contributions to its own continuing political committee. From 2012 to the present, WSAJ PAC reimbursed WSAJ at least **\$636,310** for its in-kind contributions to WSAJ PAC. See **Exhibit 3**.

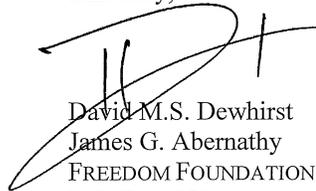
Moreover, from 2010 to present, other political committees reported reimbursements paid to WSAJ for its substantial in-kind contributions and a \$500,000 loan, a sum totaling at least **\$831,077**. See **Exhibit 4**. Therefore, WSAJ has neglected to report at least **\$1,467,387** to the PDC over the last five years. WSAJ’s failure to report these and additional in-kind contributions on required Forms L-3c or L2 demonstrate extensive and ongoing violations of RCW 42.17A.

RCW 42.17A.630(2) requires lobbyist employers to file monthly reports detailing any and all monetary or in-kind contributions of more than \$110 to candidates, elected officials, officers of public agencies, or political committees. As indicated above, WSAJ has made numerous monetary and in-kind contributions exceeding \$110 to candidates and political committees, but failed to file the reports required by § 630(2). Thus, WSAJ violated RCW 42.17A.630.

B. Conclusion.

As explained above, WSAJ violated and continues to violate RCW 42.71A.630. This Citizen Action Notice provides only some of the evidence demonstrating WSAJ’s violations. We respectfully request that the Washington Attorney General’s Office and/or the county prosecuting attorneys investigate these violations as expeditiously and efficiently as possible. Please do not hesitate to contact me if I can be of assistance. Thank you.

Sincerely,



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