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AUG 10 2010

Public Disclosure Commission

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ATTORNEY GENERAL
OF
WASHINGTON

Original via US First Class Mail

August 3, 2010

Attorney General Rob McKenna
Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

King County Prosecutor Daniel T. Satterberg
516 Third Avenue
Seattle, Washington 98104-2362

Re: Notice of Violations of RCW 42.17.241
Our File No. 2500-999

Dear Attorney General McKenna and King County Prosecutor Satterberg:

We represent UNITE HERE, a labor organization which has as members several thousand Washington taxpayers. We write on its behalf pursuant to RCW 41.17.400 to complain of violations of the State's financial disclosure requirements by a public official, UW Regent Orin Smith, and to request you take action so as to make a private lawsuit unnecessary.

As you know, UW Regents are required to list in their F-1 financial disclosure statements with the state Public Disclosure Commission all sources of over \$2000 in income. RCW 42.17.241. Mr. Smith, as retired Starbucks executive, is paid by various organizations to give speeches. According to the website of his agent Keppler Associates, he receives speakers fees of \$30,000 and up per speech. However, instead of disclosing the names of these organizations in his F-1 report filed 1/29/10, he just listed his agent's name, which is meaningless in terms of the purposes for requiring the disclosure in the first place.

This reporting is not consistent with the sample disclosure contained in the Commission's Instruction Manual of January 2010 at p. 29, which shows the identity of a trade association paying for a speech.

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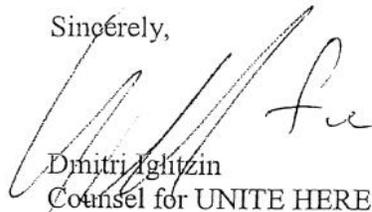
Rob McKenna & Daniel T. Satterberg
August 3, 2010
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This reporting is also not consistent with how other public officials report their speakers' fees (see enclosed sample of officials disclosing each entity paying for speeches, rather than their agent).

This reporting is also not consistent with RCW 42.17.242 ("no payment shall be accepted ... through an agent, relative or other person in such a manner as to conceal the identity of the source of the payment"). See also WAC 390-24-203(2) ("All persons required to file pursuant to RCW 42.17.241 who attend a *** excursion paid for or provided by a * * * person paying for or providing field trips or other excursions shall report the date, *name of the person paying for or providing the field trip or other excursion*, pro rata cost attributable to the filer, applicable code value, and a brief description of the field trip or other excursion as part of the F-1 statement that covers the date of the field trip or other excursion.").

My client complained of these violations directly to Mr. Smith on June 30, 2010. Receiving no response directly from him, my client's in-house counsel doublechecked with PDC to see if it had received a corrected report from Mr. Smith. No response was received. Demand is hereby made pursuant to RCW 42.17.400 that your offices obtain compliance by Mr. Smith with RCW 42.17.241(1)(f)-(g).

Sincerely,



Dmitri Aghitzin
Counsel for UNITE HERE

Enclosure

cc: Erik Van Rossum