

RECEIVED

SEP - 8 2010

Office Use Only: No. \_\_\_\_\_



Public Disclosure Commission

# WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION COMPLAINT FORM

(See instructions on the last page.)

## Description of Complaint

### 1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,

123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown

Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,

Phone: 555-123-4567, Email: pag@pag.org

Washington State Republican Party

2840 Northrup Way, Suite 140

Bellevue, WA 98004

Phone: 425-460-0570, email: luke@wsrp.org

### 2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17 or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed.

The Washington State Republican Party has violated campaign finance law in hiding from public scrutiny its financial expenditures in the State Senate race for the 26<sup>th</sup> Legislative District. On 7/29, a piece supporting Marty McClendon was mailed to houses throughout the 26<sup>th</sup> District. See attached. At the bottom of the mailer is the tagline 'Paid for and authorized by the Washington State Republican Party.' However, no record of payment for this piece, in this race, appears on PDC for the WSRP. If this piece was put out in conjunction with the McClendon campaign, then it must be reported as an in-kind contribution by the WSRP on a C4 report according to RCW 42.17.080, clause 2(c). If the WSRP acted alone, then it must be reported on a C6 report as an independent expenditure, according to RCW 42.17.080, caluse 2(c). Either way, the WSRP has violated WA State campaign finance disclosure requirements.

PDC Exhibit # 1  
Page 1 of 6

**Evidence and Witnesses**

Public Disclosure Commission

**3. EVIDENCE:**

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

*Example: Emails between Joe public and Candidate X, attached OR*

*Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.*

See attached.

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**4. WITNESSES:**

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

*Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.*

Unknown.

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**Certification** Public Disclosure Commission

**In signing this complaint:**

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Alvin M Brown  
 Street address 1129 Koda Circle SE  
 City, state and zip code Port Orchard WA 98366  
 Telephone number (including area code) 360-271-0261  
 E-mail address (optional) almarbro@waveable.com

**Oath**

**Required for complaints against elected officials or candidates for elective office:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.\*

Your signature Alvin M. Brown  
 Date signed Sept. 3, 2010  
 Place signed (city and county) Port Orchard Kitsap  
 City County

**Attachments**

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

\*RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

SEP 8 2010

**Washington State Public Disclosure Commission  
Instructions for Filing a Formal Complaint**

Public Disclosure Commission

**When to use the formal complaint form:**

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at [www.pdc.wa.gov](http://www.pdc.wa.gov). If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

**How to submit your complaint form to the PDC:**

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

**If you have more questions:**

If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at [www.pdc.wa.gov](http://www.pdc.wa.gov) under "Enforcement and Compliance." You may also contact the PDC directly.

**PDC Contact Information**

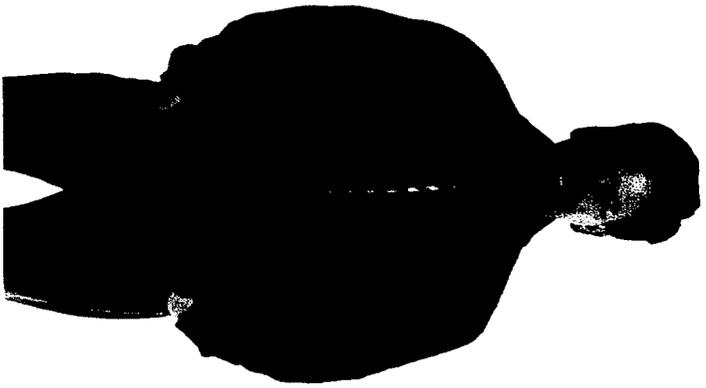
**MAILING ADDRESS:** Washington State Public Disclosure Commission  
711 Capitol Way, Room 206  
PO Box 40908  
Olympia, WA 98504-0908

**EMAIL ADDRESS:** [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

**PHONE:** 1-877-601-2828 (toll free)

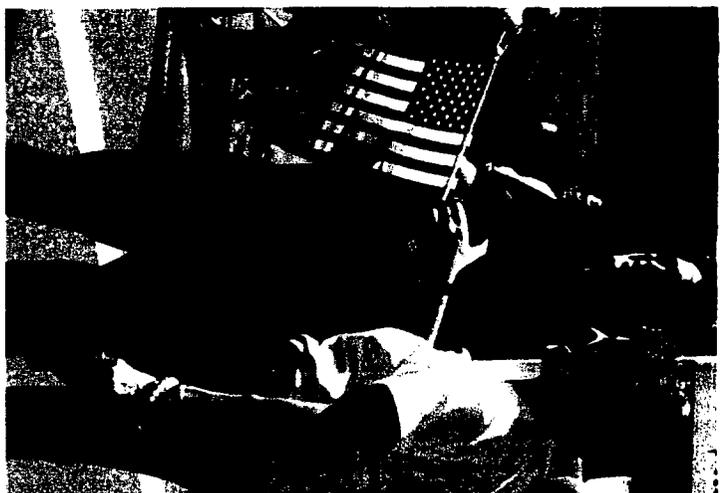
**FAX:** (360) 753-1112

**HOURS:** Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.



This is a critical election year.  
 My background in business  
 and health care provide  
 insight into our challenges.  
 Most of all, common sense  
 says we cannot keep  
 overspending.

# Marty McClendon for Senate (R)



*This year I've met tens of  
 thousands of new people going  
 door-to-door and at parades.  
 The thing I hear most often is  
 that the state must not continue  
 to increase taxes.*



*My son, Logan, has been  
 battling leukemia for 5 years.  
 Right now, he has a clean bill of  
 health. He's been fighting for his  
 life and now I'm fighting for his  
 future.*

Paid for and authorized by the Washington State Republican Party  
 2840 Northup Way, Suite 140, Bellevue, WA 98004 (425) 460-0570 www.wsrp.org

**RECEIVED**  
 SEP - 8 2010  
 Public Disclosure Commission

.....ECRLOT\*\*R 001

Non-Profit Org.  
 US Postage Paid  
 BENEVOLENT ASSOCIATION  
 PERMIT #884  
 Tacoma, WA  
 Permit #84



Family is the most important thing; here I am with Lynn, Logan, Faith, and Gracelyn. Lyn is a registered nurse. We live in Gig Harbor and earlier lived in Kitsap County.



As a real estate broker, I've seen firsthand the hardship caused by this recession. My opponent has voted for hundreds of millions of dollars in tax increases and for skyrocketing increases in spending. That's not the way to get our economy moving again.



We need better priorities. According to the state auditor government wastes billions, and yet our schools are suffering severe cuts. That's just wrong.

I believe in a citizen legislature.

I'm not a career politician.

My "day job" is working as a real estate broker and after I'm elected I'll keep working.

I'm running because our current legislators have done a poor job balancing the budget and protecting jobs.

My opponent has been in office for six years and during that time spending has skyrocketed and our taxes have gone up.

It's time for real change.



# MACCLENDON

NOV 12 2010

Public Disclosure Commission

Formal Complaint to the Washington State Public Disclosure Commission  
For Complaints Relating to Elected Official or Candidate for Public Office  
(If the Sample Complaint Form is Not Used)

Name of Official or Candidate: Washington State Republican Party

Address of Official or Candidate: 2840 Northrup Way, Suite 140

Official's or Candidate's Belleuve WA 98004  
City State Zip Code

Official's or Candidate's Telephone: 425-460-0570  
(Include Area Code)

Official's or Candidate's E-Mail Address: \_\_\_\_\_  
(If known)

Your signature: 

Your printed name: Sam Hunt

Street address: 1000 Aurora Ave 10 #100

City, state and zip code: Seattle WA 98109

Telephone number: 206-381-1220

E-Mail Address: (Optional) reprsamhunt@comcast.net

Date Signed: 11-10-2010

Place Signed (City and County): Olympia Thurston  
City County

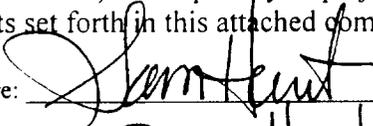
Complaint: Attach Complaint and Certification

NOV 12 2010

Public Disclosure Commission

**Certification for a  
Complaint to the Washington State Public Disclosure Commission Relating to an  
Elected Official or Candidate for Public Office  
(Notary Not Required)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature: 

Your printed name: Sam Hunt

Street address: 1000 Aurora Ave W #100

City, state and zip code: Seattle WA 98109

Telephone number: 206-381-1220

E-Mail Address: (Optional) reprsamhunt@comcast.net

Date Signed: 11-10-2010

Place Signed (City and County): Olympia Thurston  
City County

\*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

COMPLAINT ATTACHED



HOUSE DEMOCRATIC CAMPAIGN COMMITTEE

RECEIVED

NOV 12 2010

Public Disclosure Commission

November 8, 2010

Mr. Phil Stutzman  
Public Disclosure Commission  
711 Capitol Way #206  
PO Box 40908  
Olympia, WA 98504-0908

Dear Mr. Stutzman:

Please accept this letter as a formal complaint regarding improper disclosure filings by the House Republican Organizational Committee (HROC) and the Washington State Republican Party.

On October 12<sup>th</sup>, 2010, HROC filed its required form C4. That report, signed by Cary Condotta, covered campaign activities from September 1<sup>st</sup> through October 11<sup>th</sup> and listed a cash-on-hand balance of \$150,904.38.

October 12<sup>th</sup> marks the beginning of the "21 day rule" which requires timely disclosure of contributions over \$1,000 and restricts contributions over \$5,000 to bona fide State Parties exclusively.

On October 25<sup>th</sup>, the State Republican Party filed a Last Minute Contribution (LMC) stating they received the following contributions:

- 10/22/10 SRCC \$83,500
- 10/22/10 SRCC \$175,000
- 10/22/10 HROC \$120,000

PDC staff work determined that these seemingly illegal contributions were in fact received by the October 11<sup>th</sup> deadline to move more than \$5,000, but that means that both HROC and the State Republican Party failed to disclose the transfer of \$120,000 in campaign cash for more than a week.

On October 25<sup>th</sup>, HROC filed an amended c4 showing a \$120,000 contribution to the State Republican Party and disclosing a cash-on-hand balance of \$30,904.38.

That amendment was 7 days late, effectively concealing \$120,000 for that length of time.

One hundred and twenty thousand dollars is a lot of money at any point in the election cycle, but it is a particularly significant amount approaching the final 21 days of an election, as committees are scrutinizing budgets daily and making financial decisions leading up to a period of restricted

PDC Exhibit # 2  
Page 2 of 4

NOV 12 2010

Public Disclosure Commission

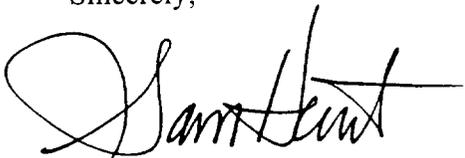
spending. There's a big difference between a cash-on-hand balance of \$150,904.38 and \$30,904.38 and it's unfathomable that this amount of money in one's bottom line could be overlooked in a c4 report or otherwise.

HROC and the State Republican Party have experienced personnel. They know the regulations surrounding the "21 Day Rule" and the reporting obligations that go with that--- no amount of spent money over \$1,000 can be invisible for more than 24 hours, yet they failed to disclose 120 times the reportable limit for 7 times longer than the allowed timeframe.

It is impossible to imagine that veteran political professionals in both organizations accidentally failed to properly report the same \$120,000 contribution in a known period of increased scrutiny. The SRCC, which as noted above made contributions to the State Republican Party totaling \$258,500, managed to file the proper paperwork in a timely manner.

I respectfully request that the Public Disclosure Commission conduct a formal investigation and if wrongdoing is discovered impose appropriate penalties as determined by law.

Sincerely,



Representative Sam Hunt  
22<sup>nd</sup> Legislative District

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE  
 100387012  
 10-25-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
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**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100.* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/24/10	Mr. Charles P. Burnett III 1425 4th Avenue Seattle, WA 98101-	Retired  OccupationRetired		X	10,000.00	10,000.00
10/24/10	Mr. David A. Clack 325 E Sprague Ave Spokane, WA 99202-1535	Investment Banker  OccupationOlympic Capital Partners		X	1,000.00	1,000.00
10/23/10	Ms. Lisa K. Bonnett-Douglass PO Box 234 Colbert, WA 99005-0234	Self Employed  OccupationHomemaker		X	5,000.00	5,000.00
10/23/10	Mr. Harlan Douglass 815 E Rosewood Ave Spokane, WA 99208-5507	Self Employed  Spokane, WA OccupationProperty Manager		X	5,000.00	5,000.00
10/22/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025	  Occupation		X	175,000.00	258,500.00
	<input checked="" type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			196,000.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			203,500.00	

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

399,500.00

4. Date of Deposit  
 10/22/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature  
 Morse Colleen

Date  
 10-25-2010

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Deposit Date  
 10/22/10

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I		G E N		Amount	Aggregate Total*
10/22/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025					X	83,500.00	258,500.00
		Occupation						
10/22/10	House Republican Organizational PO Box 7222 Olympia, WA 98507-7222					X	120,000.00	120,000.00
		Occupation						
		Occupation						
		Occupation						
		Occupation						
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		Occupation						
		Occupation						
		Occupation						
		Occupation						

Page Total 203,500.00

# CASH RECEIPTS MONETARY CONTRIBUTIONS

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388286  
 AMENDS  
 100388281  
 10-27-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
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**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
10/24/10	Mr. David A. Clack 325 E Sprague Ave Spokane, WA 99202-1535	Investment Banker OccupationOlympic Capital Partners		X	1,000.00	1,000.00
10/23/10	Ms. Lisa K. Bonnett-Douglass PO Box 234 Colbert, WA 99005-0234	Self Employed OccupationHomemaker		X	5,000.00	5,000.00
10/23/10	Mr. Harlan Douglass 815 E Rosewood Ave Spokane, WA 99208-5507	Self Employed Spokane, WA OccupationProperty Manager		X	5,000.00	5,000.00
10/22/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025	Occupation		X	175,000.00	258,500.00
10/22/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025	Occupation		X	83,500.00	258,500.00
	<input checked="" type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			269,500.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			120,000.00	

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

389,500.00

4. Date of Deposit: 10/22/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Morse Colleen Date: 10-27-2010

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Deposit Date  
 10/22/10

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
10/22/10	House Republican Organizational PO Box 7222 Olympia, WA 98507-7222	Occupation		X	120,000.00	120,000.00
		Occupation				
		Occupation				
		Occupation				
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		Occupation				
		Occupation				
		Occupation				

Page Total 120,000.00

PDC Exhibit # 4  
 Page 2 of 6

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388398

10-27-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
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**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
10/11/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025			X	83,500.00	83,500.00
	Occupation					
10/11/10	House Republican PO Box 7222 Olympia, WA 98507-7222			X	120,000.00	120,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			203,500.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			0.00	

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

203,500.00

4. Date of Deposit: 10/11/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Morse Colleen Date: 10-27-2010

# CASH RECEIPTS MONETARY CONTRIBUTIONS

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE  
 100388397  
 AMENDS  
 100388273  
 10-27-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
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**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
10/08/10	Mr. Charles P. Burnett III 1425 4th Avenue Seattle, WA 98101-	Retired		X	10,000.00	10,000.00
		Occupation Retired				
10/08/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025			X	175,000.00	175,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			185,000.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			0.00	

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

185,000.00

4. Date of Deposit: 10/08/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Morse Colleen Date: 10-27-2010

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388584  
 AMENDS  
 100388398  
 10-29-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northrup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
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1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I N T	G E N E R A L	Amount	Aggregate* Total
10/12/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025			X	83,500.00	83,500.00
	Occupation					
10/12/10	House Republican PO Box 7222 Olympia, WA 98507-7222			X	120,000.00	120,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			203,500.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

203,500.00

4. Date of Deposit  
 10/11/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature  
 Morse Colleen

Date  
 10-29-2010

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388930  
 AMENDS  
 100388584  
 11-01-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City: Bellevue, WA      Zip + 4: 98004-1433      Office Sought (candidates):      Election Date: 2010

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I N T	G E N E R A L	Amount	Aggregate* Total
10/11/10	Senate Republican Campaign PO Box 11025 Olympia, WA 98508-1025		<input type="checkbox"/>	<input checked="" type="checkbox"/>	83,500.00	83,500.00
	Occupation					
10/11/10	House Republican PO Box 7222 Olympia, WA 98507-7222		<input type="checkbox"/>	<input checked="" type="checkbox"/>	120,000.00	120,000.00
	Occupation					
	Occupation					
	Occupation					
	Occupation					
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			203,500.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

203,500.00

4. Date of Deposit: 10/12/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Morse Colleen      Date: 11-01-2010

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388289

10-27-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
----------------------	-----------------------	----------------------------	-----------------------

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:*	P R I	G E N	Amount	Aggregate* Total
10/10/10	Premera Blue Cross PO Box 327 Seattle, WA 98111-0327			X	10,000.00	10,000.00
	Occupation					
10/04/10	The Leadership Council PO Box 11025 Olympia, WA 98508-1025			X	42,500.00	42,500.00
	Occupation					
10/06/10	Microsoft Corporation 1 Microsoft Way Redmond, WA 98052-6399			X	25,000.00	25,000.00
	Occupation					
10/05/10	Murray Pacific Management Inc. 1201 Pacific Ave Ste 1750 Tacoma, WA 98402-4389			X	10,000.00	10,000.00
	Occupation					
10/08/10	Mr. Rufus W. Lumry III 305 111th Ave NE # B Bellevue, WA 98004-5875	Retired		X	10,000.00	10,000.00
	Occupation	Retired				
	<input checked="" type="checkbox"/> Check here if additional pages are attached	<b>Sub-total</b>			97,500.00	<b>*See reverse for details.</b>
		<b>Amount from attached pages</b>			10,000.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

107,500.00

4. Date of Deposit

10/08/10

Treasurer's Daytime Telephone No.: - -

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Morse Colleen

10-27-2010

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Exempt)

Deposit Date  
 10/08/10

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
10/08/10	Mrs. Patricia Lumry 305 111th Ave NE # B Bellevue, WA 98004-5875	Retired  Occupation Retired		X	10,000.00	10,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total 10,000.00

**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**  
 (1/02)

THIS SPACE FOR OFFICE USE

100388297  
 AMENDS  
 100388294  
 10-27-2010

Candidate or Committee Name (Do not abbreviate. Use full name.)  
 (Washington State Republican Party Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City Bellevue, WA	Zip + 4 98004-1433	Office Sought (candidates)	Election Date 2010
----------------------	-----------------------	----------------------------	-----------------------

**1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT**

Date Received		Amount	Total
	a. Anonymous .....	0.00	0.00
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....	0.00	0.00
	c. Loans, notes, security agreements. Attach Schedule L .....		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation .....		
	e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)	0.00	

**2. CONTRIBUTIONS OVER \$25.00**

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100:* Employer's Name, City and State	P R I	G E N	Amount	Aggregate* Total
10/11/10	Kemper Holdings LLC 575 Bellevue Sq Bellevue, WA 98004-5031			X	10,000.00	10,000.00
		Occupation				
10/11/10	Mr. Charles P. Burnett III 1425 4th Avenue Seattle, WA 98101-	Retired		X	10,000.00	10,000.00
		OccupationRetired				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			20,000.00	*See reverse for details.
		Amount from attached pages			0.00	

**3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT**  
 Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

4. Date of Deposit 10/11/10	Treasurer's Daytime Telephone No.: - -	I certify that this report is true and complete to the best of my knowledge	
		Treasurer's Signature Morse Colleen	Date 10-27-2010

Jon Ammons

RECEIVED

OCT 25 2010

Public Disclosure Commission

From: John Mannion [John.Mannion@aristotle.com]  
Sent: Monday, October 25, 2010 11:34 AM  
To: PDC  
Subject: LMC reports

Attached please find a list of contributor to the Washington State Republican Party exempt account on October 22, 2010.

22-Oct-10	\$10000	Mr. Rufus W. Lumry III	305 111th Ave NE # B	Belleve	WA	98004-5875
22-Oct-10	\$10000	Premiera Blue Cross	PO Box 327	Seattle	WA	98111-0327
22-Oct-10	\$2500	The Boeing Company	PO Box 3707	Seattle	WA	98124-2207
22-Oct-10	\$4000	Avista Corporation	PO Box 3727	Spokane	WA	99220-3727
22-Oct-10	\$1500	C.A.L.M. PAC	PO Box 11025	Olympia	WA	98508-1025
22-Oct-10	\$10000	Mr. Charles P. Burnett III	1425 4th Avenue	Seattle	WA	98101-

Thank you, John Mannion  
202-543-8345 ext 229

**Jon Ammons**

**From:** John Mannion [John.Mannion@aristotle.com]  
**Sent:** Monday, October 25, 2010 11:35 AM  
**To:** PDC  
**Subject:** LMC reports

**RECEIVED**  
OCT 25 2010

Public Disclosure Commission

Attached please find a list of contributor to the Washington State Republican Party exempt account on October 23, 2010.

23-Oct-10	\$5000	Chevron Corporation	PO Box 9034	Concord	CA	94524-1934
23-Oct-10	\$1000	WA State Auto Dealers PAC	PO Box 58170	Seattle	WA	98138-1170
23-Oct-10	\$10000	Mrs. Patricia Lumry	305 111th Ave NE # B	Bellevue	WA	98004-5875
23-Oct-10	\$10000	Murray Pacific Management Inc.	1201 Pacific Ave Ste 1750	Tacoma	WA	98402-4389
23-Oct-10	\$1250	Witt Company	3326 160th Ave SE Ste 120	Bellevue	WA	98008-6418

Thank you, John Mannion  
202-543-8345 ext 229

**Jon Ammons**

**RECEIVED**

OCT 25 2010

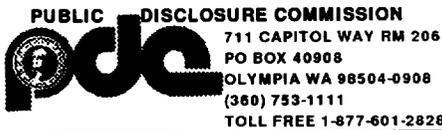
Public Disclosure Commission

**From:** John Mannion [John.Mannion@aristotle.com]  
**Sent:** Monday, October 25, 2010 11:36 AM  
**To:** PDC  
**Subject:** LMC report

List below please find a list of contributor to the Washington State Republican Party exempt account on October 24, 2010.

24-Oct-10	\$1500	Washington Health Care Association PAC	303 Cleveland Ave SE Ste 206	Tumwater	WA	98501-
24-Oct-10	\$5000	WFSE Contributions Account	Council 28 AFSCME	Olympia	WA	98501-

Thank you, John Mannion  
202-543-8345 ext 229



# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

<b>C4</b> (3/97)	PDC OFFICE USE
	100383817
	10-11-2010

Candidate or Committee Name (Do not abbreviate. Include full name)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City  
 Bellevue, WA

Zip + 4 98004-1433	Office Sought (Candidates)	Election Date 2010
Report Period Covered 09/01/10	From (last C-4) To (end of period) 09/30/10	Final Report? Yes No X

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....			\$ 125,145.21
2. Cash received (From line 2, Schedule A) .....	\$ 53,700.00		
3. In kind contributions received (From line 1, Schedule B).....	0.00		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			53,700.00
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....			178,845.21
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		109,138.65
11. Total cash expenditures (From line 4, Schedule A) .....	5,050.00	
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		5,050.00
14. Loan principal repayments made (From line 2, Schedule L).....	0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00	
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		114,188.65

CANDIDATES ONLY	Name not on ballot			
	Won	Lost	Unopposed	
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treasurer's Daytime Telephone No.:				

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17) .....	64,656.56
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	64,656.56

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Morse Colleen	10/11/10

**SUMMARY, FULL REPORT  
 RECEIPTS AND  
 EXPENDITURES**

<b>C4</b> (3/97)	<b>PDC OFFICE USE</b>
	100388408
	AMENDS
	100388406
	10-27-2010

Candidate or Committee Name (Do not abbreviate. Include full name)  
 (Washington State Republican Party Non-Exempt)

Mailing Address  
 2840 Northup Way, Ste 140

City  
 Bellevue, WA

Zip + 4 98004-1433	Office Sought (Candidates)	Election Date 2010
Report Period Covered	From (last C-4) 09/01/10	To (end of period) 10/11/10
		Final Report? Yes No X

**\*For PACs, Parties & Caucus Committees:** During this report period, did the committee make an **independent expenditure** (i.e., an expense not considered a contribution supporting or opposing a state or local candidate?)

RECEIPTS	*See next page	Yes	No
1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....			\$ 125,145.21
2. Cash received (From line 2, Schedule A) .....	\$ 442,200.00		
3. In kind contributions received (From line 1, Schedule B).....	0.00		
4. Total cash and in kind contributions received this period (Line 2 plus 3).....			442,200.00
5. Loan principal repayments made (From line 2, Schedule L).....	0.00		
6. Corrections (From line 1 or 3, Schedule C)..... Show + or (-)	0.00		
7. Net adjustments this period (Combine line 5 & 6)..... Show + or (-)			0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....			567,345.21
9. Total pledge payments due (From line 2, Schedule B).....	0.00		

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		109,138.65
11. Total cash expenditures (From line 4, Schedule A) .....	65,050.00	
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....	0.00	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12).....		65,050.00
14. Loan principal repayments made (From line 2, Schedule L).....	0.00	
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)	0.00	
16. Net adjustments this period (Combine lines 14 & 15) .....		0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....		174,188.65

CANDIDATES ONLY			
	Won	Lost	Unopposed
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treasurer's Daytime Telephone No.:			

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17) .....	393,156.56
<small>[Line 18 should equal your bank account balance(s) plus your petty cash balance.]</small>	
19. Liabilities: (Sum of loans and debts owed) .....	40,956.72
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	352,199.84

**CERTIFICATION:** I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.

Candidate's Signature	Date	Treasurer's Signature	Date
		Morse Colleen	10/27/10



WASHINGTON STATE REPUBLICAN PARTY

RECEIVED

DEC - 8 2010

Public Disclosure Commission

December 6, 2010

Philip E. Stutzman  
Director of Compliance  
Public Disclosure Commission  
711 Capitol Way, Rm 206  
P.O. Box 40908  
Olympia, WA 98504

Mr. Stutzman:

This letter is in regard to your notice of a compliant filed against the Washington State Republican Party (WSRP), dated November 24, 2010. The committee's response is as follows:

The Washington State Republican Party (WSRP) received a donation of \$120,000 from the House Republican Organizational Committee (HROC) on October 11, 2010. This donation was incorrectly entered by Aristotle International staff, the third-party firm who handles the WSRP record keeping and reporting responsibility, as having been received on October 22, 2010. This data entry error is how the transaction pulled as incorrect for the Last-Minute Contribution report filed October 25, 2010. After a discussion with staff members at the PDC, the WSRP supplied the commission with documented written instruments showing that the donation from the HROC was received prior to the 21-day contribution limits being in effect. In consultation with the PDC staff, the WSRP also amended the 21-day pre-primary report to correctly identify the date of receipt.

If you have any further questions about this matter please feel free to contact me at anytime.

Thank you,



Dan Brady  
Executive Director

## Tony Perkins

---

**From:** Tony Perkins  
**Sent:** Thursday, October 28, 2010 4:24 PM  
**To:** 'John Mannion'  
**Cc:** 'Colleen Morse'  
**Subject:** RE: Contributions to WSRP / 21-day, \$5000 timing restriction  
**Attachments:** Oct 27 2010 WSRP Non Exempt Acct C-3 Amendment.pdf

John,

Thanks for your response. I noted that the most recent C-3 amendment (copy attached) disclosing the \$120,000 HROC contribution and the \$83,000 SRCC contribution indicates a date of deposit of October 11, 2010, rather than October 12, 2010, as stated in your email.

If the October 12, 2010 date of deposit is correct, please amend again. Thank you.

Sincerely,

**Tony Perkins**

Lead Political Finance Specialist, PDC

 (360) 586-1042

 (360) 753-1112

 [tony.perkins@pdc.wa.gov](mailto:tony.perkins@pdc.wa.gov)

---

**From:** John Mannion [mailto:John.Mannion@aristotle.com]  
**Sent:** Thursday, October 28, 2010 10:28 AM  
**To:** Tony Perkins  
**Cc:** Kurt Young; Phil Stutzman  
**Subject:** RE: Contributions to WSRP / 21-day, \$5000 timing restriction

Tony, below is my response to your email with the backup you requested. Please let me know if you need anything else.

This letter is in reference to your email on 10/27/2010 questioning the acceptance of three donations by the Washington State Republican Party Non-Exempt account. The three transactions that you question are donations received by the committee prior to October 12<sup>th</sup> deadline described in your email. The \$175,000 donation from the Senate Republican Campaign Committee was received by the WA GOP committee on 10/8/2010 and was deposited on the same day. The \$120,000 received from the House Republican Organizational Committee was received by the WA GOP committee on 10/11/2010 and deposited into our bank account on 10/12/2010. The \$83,500 donation received from the Senate Republican Campaign Committee was received by WA GOP on 10/11/2010 and deposited into our account 10/12/2010. Attached you will find copies of the bank deposits for your reference. Aristotle International, which handles the campaign finance reporting for the WA State Republican Party, failed to properly disclose these transactions on the C3 reports due October 11<sup>th</sup> and October 18<sup>th</sup>, 2010. Although these transactions were received by the WA GOP committee prior to the October 12<sup>th</sup> deadline, Aristotle International failed to update the committee's donor database prior the filings due October 11<sup>th</sup> and 18<sup>th</sup> 2010. Aristotle has already filed amended C3 reports to properly disclose these transactions.

Chase Online - Deposit Det...  
 banking.chase.com

Review your deposit details — Below is a list of checks for the deposit you selected. Click "See" to see an image of the check if it is available. You can also view your deposit slip by clicking "See deposit slip", if it is available with the transaction. You can print a copy by clicking "Print" next to the image or you can right-click on the image to save a copy to your computer.

Note: If a check image is listed below it does not mean the funds from that deposit are available. Please see the "Account Activity" page for funds availability.

Deposit Item Details for State Candidate CMR 1...2724

Download all deposit details

Total deposit amount \$175,000.00      Number of checks in deposit 1      Post date 10/08/2010

See deposit slip

Items deposited

Check Number	Amount	Account	Routing Number	Action
2992	\$175,000.00	[REDACTED]	[REDACTED]	<a href="#">View</a>  <a href="#">Front</a> <a href="#">Back</a> <a href="#">Enlarge</a> <a href="#">Print</a>

SENATE REPUBLICAN CAMPAIGN COMMITTEE  
 700 1ST AVE  
 SEASIDE WA 98138  
 DATE 10/7/2010  
 \$ 175,000.00  
 Washington State Republican Party  
 One Bankers Square Ave. Des Moines WA  
 \$175,000.00  
 FOR [REDACTED]  
 [Signature]

Need help printing or saving this check?

Chase Online - Deposit Det...  
<https://banking.chase.com>  
 Suggested Sites | Web Slice Gallery | Other bookmarks

Total deposit amount \$203,500.00      Number of checks in deposit 2      Post date 10/12/2010

[+ See deposit slip](#)

Items deposited

Check Number	Amount	Account	Routing Number	Action
2996	\$60,500.00	[REDACTED]	[REDACTED]	<a href="#">See</a>
5746	\$120,000.00	[REDACTED]	[REDACTED]	<a href="#">Hide</a>

HOUSE REPUBLICAN ORGANIZATIONAL COMMITTEE  
 CHASE TITLE  
 P.O. BOX 500  
 01090, MA 01090

DATE 10/12/10

FOR WSRP

On label only enclosed \$ 120,000

DOLLARS & 00/100

for 2010 election

Need help printing or saving this check?

[Security | Terms of Use | Loan Agreements and Disclosures](#)

start | Chase Online - Depos... | Document1 - Microsoft... | Check Copies.doc - M... | 9:42 PM

Chase Online - Deposit Det...  
<https://banking.chase.com>  
 Suggested Sites | Web Slice Gallery | Other bookmarks

Deposit Item Details for State Candidate CMK (...2724)

[Download all deposit details](#)

Total deposit amount \$203,500.00      Number of checks in deposit 2      Post date 10/12/2010

[+ See deposit slip](#)

Items deposited

Check Number	Amount	Account	Routing Number	Action
2996	\$60,500.00	[REDACTED]	[REDACTED]	<a href="#">See</a>
5746	\$120,000.00	[REDACTED]	[REDACTED]	<a href="#">Hide</a>

HOUSE REPUBLICAN ORGANIZATIONAL COMMITTEE  
 CHASE TITLE  
 P.O. BOX 500  
 01090, MA 01090

DATE 10/12/10

FOR WSRP

On label only enclosed \$ 120,000

DOLLARS & 00/100

for 2010 election

Need help printing or saving this check?

[Security | Terms of Use | Loan Agreements and Disclosures](#)

www.pdc.wa.gov/archives/... Chase Online - Deposit Det...  
 https://banking.chase.com/...  
 Suggested Sites Web Site Gallery Other bookmarks

Total deposit amount: \$200,500.00      Number of checks in deposit: 2      Post date: 10/12/2010

• [See deposit slip](#)

Items deposited

Check Number	Amount	Account	Routing Number	Action
2996	\$83,500.00	[REDACTED]	[REDACTED]	<a href="#">View</a>

**SENATE REPUBLICAN CAMPAIGN COMMITTEE**  
P.O. BOX 4082  
 4010 14TH AVE S.W.

DATE: 10/12/2010

Pay to the order of: Washington State Republican Party \$ 83,500.00

Eighty Three Thousand Five Hundred & No/100

FOR [REDACTED] *[Signature]*

Need help opening or saving this check?

5748	\$120,000.00	48210199	125000574	<a href="#">View</a>
------	--------------	----------	-----------	----------------------

[Print](#)

Security | Terms of Use | Local Agreements and Disclosures

**From:** Tony Perkins [mailto:tony.perkins@pdc.wa.gov]  
**Sent:** Wednesday, October 27, 2010 7:52 PM  
**To:** John Mannion  
**Cc:** Colleen Morse; Kurt Young; Phil Stutzman  
**Subject:** Contributions to WSRP / 21-day, \$5000 timing restriction  
**Importance:** High

Dear John,

A review this afternoon of the contribution data for the Washington State Republican Party Non-Exempt Account shows the following contributions:

CONTRIBUTOR	DATE RECEIVED	AMOUNT	P/G	CITY	STATE	
SENATE REPUBLICAN CAMPAIGN COMMITTEE	2010-10-22	175000	G	OLYMPIA	WA	98
HOUSE REPUBLICAN ORGANIZATIONAL COMM	2010-10-22	120000	G	OLYMPIA	WA	98
SENATE REPUBLICAN CAMPAIGN COMMITTEE	2010-10-22	83500	G	OLYMPIA	WA	98

If the above dates and amounts are correct, each of the three contributions exceeds the \$5,000 timing restriction on contributions received within 21 days of an election. That restriction, which went into effect this year on October 12, 2010, is found in RCW 42.17.105(8), which reads as follows:

*RCW 42.17.105*

...

***(8) It is a violation of this chapter for any person to make, or for any candidate or political committee to accept from any one person, contributions reportable under RCW 42.17.090 in the aggregate exceeding fifty thousand dollars for any campaign for statewide office or exceeding five thousand dollars for any other campaign subject to the provisions of this chapter within twenty-one days of a general election. This subsection does not apply to contributions made by, or accepted from, a bona fide political party as defined in this chapter, excluding the county central committee or legislative district committee.***

Contributions from caucus committees such as SRCC or HROC to either of WSRP's accounts are subject to the 21-day, \$5,000 timing restriction. Accordingly, if the contributions were reported accurately, WSRP must conduct refunds to get the contributors down to their allowable aggregate \$5,000 during the 21-day period before the general. Alternatively, if the contributions were not reported accurately, PDC staff needs an accurate and complete explanation of when and how the contributions were received by WSRP, and an explanation of how the reporting error occurred. If the dates of receipt were reported inaccurately, please provide documentation of the actual date of receipt for each contribution.

I would appreciate a reply to this email today or early tomorrow. If it will take longer to furnish a response, please reply to let me know when I can expect to hear from you. Thanks for your prompt attention to this.

Sincerely,

**Tony Perkins**

Lead Political Finance Specialist, PDC

(360) 586-1042

(360) 753-1112

tony.perkins@pdc.wa.gov

PDC Exhibit # 11  
Page 2 of 6

## Randy Unruh

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**From:** Peter Graves [PeterGraves@wsrp.org]  
**Sent:** Monday, June 06, 2011 8:55 AM  
**To:** Phil Stutzman; Chairman Wilbur  
**Cc:** Kurt Young; Randy Unruh; David Mason; Kerri Gursinski; Timothy Hartpence; Katie Granger; Colleen Morse  
**Subject:** RE: PDC Case No. 11-020 - Additional Response Requested  
**Attachments:** WSRP Operations Manual.pdf

Hi Phil –

As you can imagine our political organization has gone through quite a bit of turnover since 2010. We have a new Chairman, and I am now the Executive Director. I will have to work through these questions with Aristotle International, our compliance company since 2009. I can immediately respond to one of your questions, and I have it below.

- **Describe the process during 2010 for handling receipts, deposits, and reporting of campaign contributions.** Please see the attached document which outlines the WSRP Operations Manual. This should also answer the next question of who was responsible for implementing the process.

We'll be in touch soon regarding the other information. Thank you for being patient with us.

Peter Graves

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Washington State Republican Party

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**From:** Phil Stutzman [mailto:phil.stutzman@pdc.wa.gov]  
**Sent:** Friday, June 03, 2011 11:40 AM  
**To:** Chairman Wilbur; Peter Graves  
**Cc:** Kurt Young; Randy Unruh  
**Subject:** PDC Case No. 11-020 - Additional Response Requested

Kirby Wilbur, Chair  
Peter Graves, Executive Director

I am attaching a letter that is also being sent by U.S. mail concerning our investigation of PDC Case No. 11-020. If you have questions about the letter, you may contact Kurt Young or Randy Unruh. Thank you for your prompt attention to this matter.

Phil Stutzman

**Philip E. Stutzman**  
Director of Compliance  
Washington State Public Disclosure Commission  
711 Capitol Way, Rm. 206/ P.O. Box 40908  
Olympia, WA 98504-0908  
(360) 753-1111/Fax (360) 753-1112  
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toll-free in Washington State: 1-877-601-2828  
Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)



WASHINGTON STATE REPUBLICAN PARTY

Philip E. Stutzman  
Director of Compliance  
Public Disclosure Commission  
P.O.Box 40908  
Olympia, WA 98504-0908

Dear Mr. Stutzman:

This is in further response to your letter of June 3 regarding WSRP reports in the fall of 2010.

In general, during the fall of 2010 WSRP employees entered receipt and disbursement data in bookkeeping software and then in compliance software, and employees of our contractor, Aristotle International, reviewed data and prepared PDC and other compliance reports. The high volume of activity in the fall of an election year, changes in personnel, and failure to follow procedures led to several errors in reporting. In some cases data entry was incomplete at the time reports were due and errors were discovered and addressed and amendments filed during subsequent account reviews. Given the passage of time and changes in personnel it is difficult to provide detailed explanations for some reporting errors, except to note that despite some initial mistakes WSRP and Aristotle personnel continuously reviewed reports and attempted to rectify errors as soon as possible.

The WSRP executive committee, staff, and contractor are all aware of and concerned about the reporting problems last fall. We have taken several steps to address these problems, including hiring a new Controller, retraining staff, revising contractor account management and supervision, refining procedures, and re-emphasizing the necessity to follow established procedures throughout the financial management and reporting processes.

With this background let me address your specific questions.

1. The received and deposit entries were not the same in our database, and the report was pulled using the deposit date, and not received date. This error was discovered in a subsequent review and remedied as soon thereafter as possible, and we have trained staff to ensure this does not happen again.
2. You indicate no further response is required.
3. Exempt Account Contributions.

These reports were filed late because of the same errors listed in response to Question 1. The errors were discovered and rectified during subsequent reviews of accounts. We have described the process and responsibilities for receipt, deposit, and reporting of campaign contributions in a previous response and above. It appears that LMC reports were filed when certain of these disbursements were entered into the database with a default receipt date and that subsequent reports were filed and amended as errors were identified and resolved. In some cases inaccurate account reconciliation caused additional errors. Bank statements indicating actual deposit dates are attached. If you believe it would be useful to further amend our reports to correct certain of these dates, please advise us and we will make appropriate amendments.

#### 4. WSRP Non-Exempt Account

WSRP initially enters disbursements and cuts checks from a QuickBooks accounting program. Staff members then enter information from QuickBooks into reporting software. In some instances last fall there were delays between making a disbursement from QuickBooks and entering relevant information onto reporting software. A reporting error from Aristotle appears to be the reason this contribution was reported late. The error was discovered and addressed during a subsequent review of the account.

#### 5. Contributions Received for the Non-Exempt Account

It appears that the contributions from the SRCC may have been entered in the reporting software late due to the high volume of activity in October. The contributions may initially have been entered with a default receipt date of the date they were entered in the software (most likely October 22). The correct date was identified and the proper receipt date reported during the reporting review process.

We appreciate the opportunity to respond to and resolve these reporting issues. Let me reiterate our commitment to improving our reporting processes going forward.

Sincerely,



Peter Graves  
Executive Director, Washington State Republican Party

**CHASE**  
 JPMorgan Chase Bank, N.A.  
 P O Box 659754  
 San Antonio, TX 78265 - 9754

September 01, 2010 through September 30, 2010  
 Account Number: [REDACTED]

**CUSTOMER SERVICE INFORMATION**

Web site: **Chase.com**  
 Service Center: **1-800-242-7338**  
 Hearing Impaired: **1-800-242-7383**  
 Para Espanol: **1-888-622-4273**  
 International Calls: **1-713-262-1679**

00024988 DRE 702 141 27410 - NNNNN T 1 000000000 65 0000  
 WASHINGTON STATE REPUBLICAN PARTY  
 EXEMPT ACCOUNT  
 2840 NORTHUP WAY STE 140  
 BELLEVUE WA 98004-1433



**CHECKING SUMMARY** Chase Free Business Checking

	INSTANCES	AMOUNT
<b>Beginning Balance</b>		<b>\$33,613.22</b>
Deposits and Additions	15	13,375.00
Checks Paid	4	- 31,300.00
Electronic Withdrawals	3	- 100.76
<b>Ending Balance</b>	<b>22</b>	<b>\$15,587.46</b>

**DEPOSITS AND ADDITIONS**

DATE	DESCRIPTION	AMOUNT
09/01	Deposit	\$50.00
09/02	American Express Settlement [REDACTED]	475.00
09/07	Deposit	250.00
09/10	American Express Settlement [REDACTED]	40.00
09/13	American Express Settlement [REDACTED]	65.00
09/17	Deposit	40.00
09/20	Deposit	250.00
09/23	American Express Settlement [REDACTED]	80.00
09/24	Deposit	25.00
09/24	American Express Settlement [REDACTED]	10.00
09/27	American Express Settlement [REDACTED]	100.00
09/27	American Express Settlement [REDACTED]	50.00
09/28	Deposit	10,165.00
09/28	Deposit	1,500.00
09/30	American Express Settlement [REDACTED]	275.00
<b>Total Deposits and Additions</b>		<b>\$13,375.00</b>

9.27-E 9/27 10,165.00 Premium



JPMorgan Chase Bank, N.A.  
 P O Box 659754  
 San Antonio, TX 78265 - 9754

October 01, 2010 through October 29, 2010  
 Account Number: [REDACTED]

**CUSTOMER SERVICE INFORMATION**

Web site: **Chase.com**  
 Service Center: **1-800-242-7338**  
 Hearing Impaired: **1-800-242-7383**  
 Para Espanol: **1-888-622-4273**  
 International Calls: **1-713-262-1679**

00044040 DRE 702 143 30310 - NNNNN T 1 000000000 65 0000  
 WASHINGTON STATE REPUBLICAN PARTY  
 EXEMPT ACCOUNT  
 2840 NORTHUP WAY STE 140  
 BELLEVUE WA 98004-1433



*Pre-money ok  
 deposited - 9/28  
 received - 9/27*

**CHECKING SUMMARY**

Chase Free Business Checking

	INSTANCES	AMOUNT
<b>Beginning Balance</b>		<b>\$15,587.46</b>
Deposits and Additions	33	189,957.00
Checks Paid	2	- 5,393.00
Electronic Withdrawals	4	- 65,226.66
<b>Ending Balance</b>	<b>39</b>	<b>\$134,924.80</b>

**DEPOSITS AND ADDITIONS**

DATE	DESCRIPTION	AMOUNT	
10/01	American Express Settlement [REDACTED] CCD ID: [REDACTED]	\$75.00	
10/04	Deposit	42,625.00	9/29 - E 9/28 Leadership
10/04	Deposit	5,025.00	
10/04	Deposit	30.00	
10/04	American Express Settlement [REDACTED] CCD ID: [REDACTED]	260.00	
10/06	Deposit	27,500.00	10.06 - E 10/6 microsoft
10/06	Deposit	2,500.00	
10/07	American Express Settlement [REDACTED] CCD ID: [REDACTED]	200.00	
10/12	Deposit	10,000.00	10.11 - E 10/11 Kemper
10/12	Deposit	10,000.00	10.12 - E 10/12 Burnett
10/12	American Express Settlement [REDACTED] CCD ID: [REDACTED]	705.00	
10/12	American Express Settlement [REDACTED] CCD ID: [REDACTED]	55.00	
10/14	Merchant Service Merch Dep [REDACTED] CCD ID: [REDACTED]	20,000.00	10.12 - (C-E) 10/12 Lunny x 2
10/14	American Express Settlement [REDACTED] CCD ID: [REDACTED]	55.00	
10/15	American Express Settlement [REDACTED] CCD ID: [REDACTED]	525.00	
10/18	Deposit	11,000.00	
10/18	Deposit	10,400.00	10.12 - 2-E 10/12 Murray
10/18	Deposit	5,000.00	
10/18	American Express Settlement [REDACTED] CCD ID: [REDACTED]	455.00	
10/18	American Express Settlement [REDACTED] CCD ID: [REDACTED]	250.00	
10/19	Deposit	260.00	