

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.

Citizens for Judicial Excellence 603 Stewart Street, Suite 819 Seattle, WA 98101

www.cjepac.com

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.

On information Citizens for Judicial Excellence (CJE) has actively recruited and supported candidates to run for municipal and district court positions. I understand that this support has included financial contributions, promises of financial support by members of CJE, campaign assistance with campaign messaging and direct support by Mary Ann Ottinger a paid CJE consultant. CJE has not reported the value of its independent expenditures and the campaigns of candidates that it has been supporting has not reported the in-kind value of the CJE independent expenditures. The PDC database indicates that CJE has over \$198,000 in cash on hand as of 9/25/2010 and I understand that CJE intends to make additional independent expenditures.

Evidence and Witnesses

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.

Ed McKenna admitted at an editorial board meeting for The Stranger on September 23, 2010 that he has had contact with Mary Ann Ottinger since he filed for a position on the Seattle Municipal Court. Ms. Ottinger is a paid consult to CJE. On or about June 10, 2010 Ed McKenna admitted to Judge Fred Bonner of Seattle Municipal Court that he was recruited by CJE to withdraw a candidate filing and re-file against an incumbent judge that CJE has targeted. In the conversation with Judge Boner Ed McKenna reportedly represented that CJE promised substantial financial support if he re-filed in the municipal court election.

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

Judge Fred Bonner, Seattle Municipal Court (206) 684-8709

John Wycle,(206) 321-9890

SEP 28 2010

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Certification

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) James Tupper

Street address 2025 Firs Avenue, Suite 1100

City, state and zip code Seattle, WA 98121

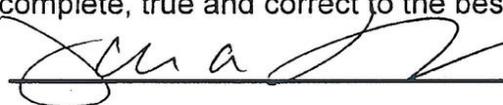
Telephone number (including area code) (206) 493-2300

E-mail address (optional) tupper@tuppermackbrower.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 

Date signed September 25, 2010

Place signed (city and county)

Seattle

King

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."*