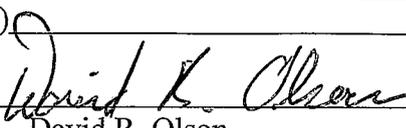


DEC 17 2010

**Formal Complaint to the Washington State Public Disclosure Commission
Relating to: A Candidate for Public Office**

Name of Candidate: Dean Willard
Street Address of Candidate: PO Box 368
City, State and Zip Code Issaquah, WA 98027 - 0015
Treasurer of Candidate: Dorothy Willard
Candidate's Telephone: (425) 657-0579
Treasurer's Email (optional) _____

Your signature 
Your printed name: David R. Olson
Your Street Address: 14226 442nd Ave SE
City, State and Zip Code North Bend, WA 98045-9208
Telephone Number: (425) 888-6046
Email Address: dbolson72@comcast.net
Date Signed 12-17-10
Place Signed North Bend, WA

Complaint: (Attach Complaint and Certification)

DEC 17 2010

**Certification for a
Complaint to the Washington State Public Disclosure Commission
Relating to: A Candidate for Public Office**

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: David R. Olson

Your printed name: David R. Olson

Street Address: 14226 442nd Ave SE

City, State and Zip Code North Bend, WA 98045-9208

Telephone Number: (425) 888-6046

Email Address: dbolson72@comcast.net

Date Signed December 17, 2010

Place Signed North Bend, WA

* 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

Washington State Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504 – 0908

DATE FILED PDC

DEC 17 2010

FAX # (360) 753-1112
PHONE: (360) 753-1111

December 17, 2010

To whom it may concern,

I am making this formal complaint against Dean Willard, a candidate for public office and his campaign Treasurer, Dorothy Willard. Mr. Willard ran for the Washington State House of Representatives, 5th Legislative District, Position 2 and was defeated in the Primary in August 2010. Dorothy Willard is not only the Treasurer of her husband's campaign. She is also the Treasurer of the 5th District Democrats. Both Dean and Dorothy are also on the Board of the 5th District Democrats.

I, David R. Olson, am the elected Democratic Precinct Committee Officer (PCO) for Sean Precinct in the 5th Legislative District since 2004. My wife, Elizabeth D. Olson, was the Treasurer for the 5th Legislative District Democrats until September 2008. We believe that Dean and Dorothy Willard have failed to comply with Washington State Public Disclosure laws in

1. Accepting \$7,550 in donations for the 2010 General Election when Mr. Willard was not on the Ballot for the General Election.
2. Spending all \$7,550 in illegal General Elections donations on the 2010 Primary Election, thereby ignoring and exceeding the campaign donation limits for the Primary.
3. Failing to report and thereby hiding over \$5,000 in Primary Expenses for more than 4 months.
4. Failing to properly report a \$20,000 very large last minute personal donation.

Evidence supporting these four claims is described in greater detail below.

I. EVIDENCE FROM THE PUBLIC DISCLOSURE COMMISSION WEBSITE THAT DEAN WILLARD ACCEPTED CONTRIBUTIONS FOR THE GENERAL ELECTION:

Go to: http://www.pdc.wa.gov/MvcQuerySystem/Candidate/leg_candidates?page=3

 Building Confidence in the Political Process
Public Disclosure Commission

HOME PUBLIC RESOURCES FILTER RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE

CANDIDATES COMMITTEES INDEPENDENT SPENDING ADVANCED SEARCH

STATEWIDE LEGISLATIVE JUDICIAL LOCAL SURPLUS

Year: Total Raised: \$24,409,393.39 Total Spent: \$21,630,189.81
2010 Total IE Supporting: \$1,962,635.74 Total IE Opposing: \$1,914,716.62

NOTE: Click on a column header to sort by that column, or click on the  icon to filter your results      BOOKMARK

Drag a column header and drop it here to group by that column

Details	Name	Dist	Office	Pos	Pty	Raised	Spent	Debt
Details	HOOVER GREGORY S	05	STATE REPRESENTATIVE	01	D	\$42,778.84	\$42,778.84	\$0.00
Details	RODNE JAY R	05	STATE REPRESENTATIVE	01	R	\$93,714.82	\$59,896.41	\$0.00
Details	ANDERSON EDWIN GLENN	05	STATE REPRESENTATIVE	02	R	\$71,381.70	\$71,010.17	\$0.00
Details	SPRING DAVID	05	STATE REPRESENTATIVE	02	D	\$6,965.12	\$6,965.12	\$1,000.00
Details	WILLARD DEAN L	05	STATE REPRESENTATIVE	02	D	\$99,495.41	\$87,174.72	\$4,700.00

This summary showed that as of December 14, 2010, Dean Willard had raised \$99,495 and spent \$87,174.

DEC 17 2010

Then click on Willard **Details** to get lists of actual donations and expenses: This first page shows CASH CONTRIBUTIONS and lists Dean Willard Donations by amount. **Dean Willard raised \$70,264 in Cash Contributions:**

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	5TH DISTRICT DEMOCRATS	8/9/2010	\$5,000.00	P	ISSAQUAH	WA	980270076		
Report	5TH DISTRICT DEMOCRATS	4/8/2010	\$1,500.00	P	ISSAQUAH	WA	980270076		
Report	ACHILLES TODD B	3/18/2010	\$800.00	P	SEATTLE	WA	981223523	BALIUS VENTURES LLC	MANAGING MEMBER
Report	ALMAGAMATED TRANSIT UNION LOCAL 587	10/29/2010	\$800.00	P	SEATTLE	WA	981211261		
Report	AMALGAMATED TRANSIT UNION LEGISLATIVE COUNCIL	8/1/2010	\$800.00	P	OLYMPIA	WA	985017500		
Report	BARDEN THOMAS D	2/8/2010	\$800.00	P	SEATTLE	WA	981123903	ACCENTURE	CONSULTANT
Report	BRAINERD PAUL	7/14/2010	\$800.00	P	SEATTLE	WA	981212172	RETIRED	RETIRED
Report	CREW ROGER F	6/25/2010	\$800.00	P	MERCER ISLAND	WA	980404917	SELF	SOFTWARE ENGINEER
Report	DONAHOE FRANKLIN L JR.	3/2/2010	\$800.00	P	BOTHELL	WA	980124914	T-MOBILE USA	DIRECTOR OF INFORMATION S
Report	EAST KING CO LAWYERS FOR JUSTICE	7/2/2010	\$800.00	P	KIRKLAND	WA	980833143		
Report	FREESE MICHAEL S	2/25/2010	\$800.00	P	PORTLAND	OR	972394557	HP	EXECUTIVE
Report	FREESE MICHAEL S	2/25/2010	\$800.00	G	PORTLAND	OR	972394557	HP	EXECUTIVE
Report	IUPAT DISTRICT COUNCIL #5, AFL-CIO	10/29/2010	\$800.00	P	SEATTLE	WA	981083405		
Report	JOHNSON LINDA K	4/29/2010	\$800.00	P	MEDINA	WA	980395301	NONE	HOMEMAKER
Report	JOHNSON THEODORE C	4/29/2010	\$800.00	P	MEDINA	WA	980395301	MICROSOFT CORPORATION	PROGRAM MANAGER

Note that some of these donations, such as Michael Freese, are listed for the General Election (shown with a G under the P/G column). The problem with this is that Dean Willard was not listed as a candidate in the General Election. The second problem is that General Election funds are not permitted to be spent in the Primary.

There are many more General Election donations on the following 10 pages and as are shown below. At the end of these pages, there is a Table summarizing all of the illegal donations.

There are three General Election contributions on Page 2:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	JUSTICE POLITICAL ACTION COMMITTEE	7/4/2010	\$800.00	P	TACOMA	WA	984446474		
Report	LIEWEKE TARA	12/31/2009	\$800.00	P	MERCER ISLAND	WA	980404429	WINDERMERE	REAL ESTATE
Report	LIEWEKE TOD	12/31/2009	\$800.00	P	MERCER ISLAND	WA	980404429	VULCAN SPORTS AND ENTERTAINMENT	CEO
Report	LILLIE ELIZABETH D	4/21/2010	\$800.00	P	LONDON	UK	SE12BB	NONE	UNEMPLOYED
Report	LILLIE ELIZABETH D	4/22/2010	\$800.00	G	LONDON	UK	SE12BB	NONE	UNEMPLOYED
Report	MEDLIN MATTHEW G	12/28/2009	\$800.00	P	ARLINGTON	VA	222075315	HURON CONSULTING	ACCOUNTANT
Report	NORTHERN ATTORNEYS PAC	7/2/2010	\$800.00	P	MOUNT VERNON	WA	982734252		
Report	SHIRLEY E. MARY	7/14/2010	\$800.00	P	MEDINA	WA	980390685	RETIRED	RETIRED
Report	SHIRLEY JON A	7/14/2010	\$800.00	P	MEDINA	WA	980390685	RETIRED	RETIRED
Report	UA LOCAL 32 PLUMBERS AND PIPEFITTERS	7/20/2010	\$800.00	P	RENTON	WA	980572974		
Report	WASHINGTON TEAMSTERS LEGISLATIVE LEAGUE	7/23/2010	\$800.00	P	TUKWILA	WA	981684614		
Report	WASHINGTON TEAMSTERS LEGISLATIVE LEAGUE	7/23/2010	\$800.00	G	TUKWILA	WA	981684614		
Report	WEA PAC	7/4/2010	\$800.00	P	FEDERAL WAY	WA	980639100		
Report	WILLARD DOROTHY	12/29/2009	\$800.00	P	SAMMAMISH	WA	980757215	RETIRED	RETIRED
Report	WILLARD DOROTHY	12/29/2009	\$800.00	G	SAMMAMISH	WA	980757215	RETIRED	RETIRED

DEC 17 2010

There are 2 General Election contributions on Page 3:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	YOUNG JIM	2/19/2010	\$800.00	P	ISSAQUAH	WA	980292626	RETIRED	RETIRED
Report	YOUNG JIM	2/19/2010	\$800.00	G	ISSAQUAH	WA	980292626	RETIRED	RETIRED
Report	MALLAHAN CAROLYN	6/16/2010	\$600.00	G	SEATTLE	WA	981038236	UNEMPLOYED	UNEMPLOYED
Report	SCOLA ROBYN	5/22/2010	\$800.00	P	ISSAQUAH	WA	980297570	NONE	HOMEMAKER
Report	AKVELON	6/15/2010	\$500.00	P	BELLEVUE	WA	980043736		
Report	AUSTIN JIM	7/2/2010	\$500.00	P	ISSAQUAH	WA	980299122	KARR TUTTLE CAMPBELL	ATTORNEY
Report	BARBER CAROLYN J	2/8/2010	\$500.00	P	PORTLAND	OR	972213548	SELF EMPLOYED	CONSULTANT
Report	BENNETT JASON C	12/28/2009	\$500.00	P	SEATTLE	WA	981192775	ARGO STRATEGIES	OWNER
Report	COMMUNICATION WORKERS OF AMERICA-COPE PCC	8/10/2010	\$500.00	P	WASHINGTON	DC	200012760		
Report	FROCKT DAVID	6/24/2010	\$500.00	P	SEATTLE	WA	981157819	BERGMAN, DRAPER & FROCKT PLLC	ATTORNEY
Report	HEAPS STEVEN H	12/29/2009	\$500.00	P	AUBURN	WA	980013000	T-MOBILE	FINANCE
Report	IRON WORKERS LOCAL 86	7/29/2010	\$500.00	P	PORTLAND	OR	972209016		
Report	KOPP CHERYL	5/9/2010	\$500.00	P	MAPLE VALLEY	WA	980380200	NONE	RETIRED
Report	LANE RICHARD A	2/8/2010	\$500.00	P	PORTLAND	OR	972196367	SELF EMPLOYED	LAWYER
Report	LEGNON LEE	5/26/2010	\$500.00	P	BELLEVUE	WA	980061139	MCAFFEE INC.	SENIOR MANAGER

There are 2 General Election contributions on Page 4:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	MALLAHAN CAROLYN	1/23/2010	\$500.00	P	SEATTLE	WA	981038236	UNEMPLOYED	UNEMPLOYED
Report	MALLAHAN JOE	1/23/2010	\$500.00	P	SEATTLE	WA	981038236	T-MOBILE USA	VICE PRESIDENT
Report	MALLAHAN JOSEPH	5/10/2010	\$500.00	G	SEATTLE	WA	981038236	T-MOBILE USA	VICE PRESIDENT
Report	MEDLIN MATTHEW G	3/22/2010	\$500.00	G	ARLINGTON	VA	222075315	DUFF & PHELPS LLC	CPA
Report	MERK CAROLYN	8/9/2010	\$500.00	P	GAITHERSBURG	MD	208624226	EMENTUM	CEO
Report	MORRISON JAMES	12/26/2009	\$500.00	P	LACEY	WA	985032495	EV COMPONENTS LLC	CEO
Report	NORDHOFF NANCY	6/25/2010	\$500.00	P	LANGLEY	WA	982600306	RETIRED	RETIRED
Report	PHELPS WILLIAM	3/15/2010	\$500.00	P	ALEXANDRIA	VA	223143116	ACCENTURE	EXECUTIVE
Report	SINEGAL JAMES D	3/29/2010	\$500.00	P	ISSAQUAH	WA	980278990	COSTCO	CEO
Report	SKOUNTRIANOS HELEN	12/31/2009	\$500.00	P	RENTON	WA	980580627	ORTHODONTIC EXCELLENCE	ORTHODONTIST
Report	VIRK MAHADEEP S	12/31/2009	\$500.00	P	RENTON	WA	980580627	ORTHODONTIC EXCELLENCE	ORTHODONTIST
Report	WA PUBLIC EMPLOYEES ASSOCIATION	6/15/2010	\$500.00	P	OLYMPIA	WA	985077159		
Report	WALKER LORIN	2/8/2010	\$500.00	P	PRESTON	WA	980500514	THETC	DIRECTOR OF FINANCE
Report	WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE	7/4/2010	\$500.00	P	SEATTLE	WA	981940027		
Report	YOUNG LESLIE A	7/28/2010	\$500.00	P	ISSAQUAH	WA	980292626	RETIRED	RETIRED

DEC 17 2010

There is one General Election contribution on Page 5:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	5TH DISTRICT DEMOCRATS	6/5/2010	\$421.06	P	ISSAQUAH	WA	980270076		
Report	GORIN RALPH E	6/21/2010	\$300.00	P	REDMOND	WA	980732631	XKL, LLC	COMPUTER SCIENTIST
Report	MALLAHAN CAROLYN	2/28/2010	\$300.00	P	SEATTLE	WA	981038236	UNEMPLOYED	UNEMPLOYED
Report	MALLAHAN JOSEPH	2/28/2010	\$300.00	P	SEATTLE	WA	981038236	T-MOBILE USA	VICE PRESIDENT
Report	MAXWELL DAVID K	3/21/2010	\$300.00	P	REDMOND	WA	980531982	T-MOBILE	VP FINANCE
Report	MEDLIN MATTHEW G	6/22/2010	\$300.00	G	ARLINGTON	VA	222075315	DUFF & PHELPS, LLC	ACCOUNTANT
Report	MORRISON JAMES	6/20/2010	\$300.00	P	LACEY	WA	985032495	SELF	BUSINESS OWNER
Report	RUSSELL NATHAN	7/29/2010	\$300.00	P	RENTON	WA	98056	SELF-EMPLOYED	CONSULTANT
Report	WALKER LORIN	4/21/2010	\$300.00	P	PRESTON	WA	980500514	THE TC	FINANCE DIRECTOR
Report	WHITE DUNCAN M	5/19/2010	\$300.00	P	GREENWOOD VILLAGE	CO	801213927	ACCENTURE	CONSULTANT
Report	AUSTIN JIM	8/11/2010	\$250.00	P	ISSAQUAH	WA	980299122	KARR TUTTLE CAMPBELL	ATTORNEY
Report	AUSTIN LESLEY	8/11/2010	\$250.00	P	ISSAQUAH	WA	980299122	RETIRED	RETIRED
Report	BARDEN STEPHANIE	7/26/2010	\$250.00	P	SEATTLE	WA	981123903	SELF EMPLOYED	SELF EMPLOYED
Report	CARTER CORDELL	2/15/2010	\$250.00	P	SEATTLE	WA	981183937	SEATTLE PUBLIC SCHOOLS	ADMINISTRATOR
Report	CLARK JOHN C	5/25/2010	\$250.00	P	SLEEPY HOLLOW	IL	601183124	DELOITTE & TOUCHE	CONSULTANT

There is one General Election contribution on Page 6:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	HUCKABAY KATHLEEN	7/30/2010	\$250.00	P	SAMMAMISH	WA	980759281	US BANK	CFP
Report	NESS BOB	12/30/2009	\$250.00	P	FALL CITY	WA	980240850	KING COUNTY SHERIFF'S DEPUTY	RETIRED
Report	IRONS DI	12/30/2009	\$250.00	P	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT
Report	KOPP CHERYL	1/11/2010	\$250.00	P	MAPLE VALLEY	WA	980380200	NONE	RETIRED
Report	LANE RICHARD A	5/15/2010	\$250.00	P	PORTLAND	OR	972196367	SELF EMPLOYED	LAWYER
Report	MILLER DAVID A	3/24/2010	\$250.00	P	SEATTLE	WA	981055238	T-MOBILE USA	ATTORNEY
Report	SIMS JOSEPH	5/19/2010	\$250.00	P	KIRKLAND	WA	980337207	SELF EMPLOYED	CONSULTANT
Report	STEELE RORY	5/19/2010	\$250.00	P	SEATTLE	WA	981037281	ARGO STRATEGIES	CONSULTANT
Report	TATE SHARON	8/17/2010	\$250.00	P	PRESTON	WA	980500421	RETIRED	RETIRED
Report	TATE SHARON	7/2/2010	\$250.00	P	PRESTON	WA	980500421	RETIRED	RETIRED
Report	WALKER LORIN	6/7/2010	\$250.00	G	PRESTON	WA	980500514	THE TC	FINANCE DIRECTOR
Report	WOOTTON GILBERT D	1/14/2010	\$250.00	P	MERCER ISLAND	WA	980405765	ACCENTURE	CONSULTING
Report	IBEW LOCAL 46	7/29/2010	\$246.46	P	KENT	WA	980321140		
Report	BELENKY AARON	8/24/2010	\$200.00	P	RENTON	WA	980562070	K-FORCE	PROGRAMMER
Report	BOYER ALISON	8/17/2010	\$200.00	P	SAMMAMISH	WA	980757215	JOHN L. SCOTT	REALTOR

DEC 17 2010

There are 4 General Election contributions on Page 7:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	CHOPP FRANK	8/11/2010	\$200.00	P	SEATTLE	WA	981037658	SOLID GROUND	COMMUNITY SERVICE
Report	DOHERTY RICHARD M	7/15/2010	\$200.00	P	KIRKLAND	WA	980345801	RIGHT MANAGEMENT	CONSULTANT
Report	EDWARDS RONALD	7/29/2010	\$200.00	P	BELLEVUE	WA	980076434	RETIRED	RETIRED
Report	FORD MARK	5/7/2010	\$200.00	P	ANN ARBOR	MI	481044275	DELOITTE	PARTNER
Report	FRAZIER DAVID	8/4/2010	\$200.00	P	ANCHORAGE	AK	995084047	SELF	INSURANCE BROKER
Report	GORIN RALPH E	7/30/2010	\$200.00	P	REDMOND	WA	980732631	XXL, LLC	COMPUTER SCIENTIST
Report	HABIB K. CYRUS	7/21/2010	\$200.00	P	BELLEVUE	WA	980048673	PERKINS COIE LLP	ATTORNEY
Report	NESS BOB	8/11/2010	\$200.00	P	FALL CITY	WA	980240850	RETIRED	RETIRED
Report	LIEWEKE TARA	12/31/2009	\$200.00	G	MERCER ISLAND	WA	980404429	WINDERMERE	REAL ESTATE
Report	LIEWEKE TOD	12/31/2009	\$200.00	G	MERCER ISLAND	WA	980404429	VULCAN SPORTS AND ENTERTAINMENT	CEO
Report	MALLAHAN CAROLYN	2/26/2010	\$200.00	G	SEATTLE	WA	981038236	UNEMPLOYED	UNEMPLOYED
Report	MALLAHAN JOSEPH	2/28/2010	\$200.00	G	SEATTLE	WA	981038236	T-MOBILE USA	VICE PRESIDENT
Report	MLK, JR. COUNTY LABOR COUNCIL, AFL-CIO	6/25/2010	\$200.00	P	SEATTLE	WA	981211131		
Report	OSGOOD JASON A	4/21/2010	\$200.00	P	SEATTLE	WA	981033124	MEDPLUS	PROGRAMMER
Report	PENNINGTON STEVEN L.	3/19/2010	\$200.00	P	EDMONDS	WA	980205124	RETIRED	RETIRED

There are 3 General Election contributions on Page 8:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	POWELL REUBEN	6/7/2010	\$200.00	P	HOBART	WA	980250052	RETIRED	RETIRED
Report	SHIRLEY E. MARY	7/14/2010	\$200.00	G	MEDINA	WA	980390685	RETIRED	RETIRED
Report	SHIRLEY JON A	7/14/2010	\$200.00	G	MEDINA	WA	980390685	RETIRED	RETIRED
Report	SMUTZ PATRICK	6/7/2010	\$200.00	P	ISSAQUAH	WA	980277344	NW LECET	COMMUNICATIONS DIRECTOR
Report	STICKEL SHEILA	12/31/2009	\$200.00	P	SEATTLE	WA	981094512	THE ADVOCACY GROUP	CONSULTANT
Report	WA STATE BUILDING & CONSTRUCTION TRADES COUNCIL, AFL-CIO	8/9/2010	\$200.00	P	OLYMPIA	WA	985064658		
Report	WALKER LORIN	4/21/2010	\$200.00	G	PRESTON	WA	980500514	THE TC	FINANCE DIRECTOR
Report	WASHINGTON STATE LABOR COUNCIL, AFL-CIO	6/25/2010	\$200.00	P	SEATTLE	WA	981194104		
Report	WEAVER SUZANNE	6/9/2010	\$200.00	P	SAMMAMISH	WA	980756309	N/A	HOMEMAKER
Report	COUSSENS PATRICK	6/7/2010	\$175.00	P	SEATTLE	WA	981094512	SELF-EMPLOYED	SELF-EMPLOYED
Report	MARTS TOLA	7/31/2010	\$175.00	P	ISSAQUAH	WA	980274519	BLUE ORIGIN	ENGINEER
Report	COHEN DAN	12/29/2009	\$150.00	P	OAKLAND	CA	946122947	FCP	PR
Report	JUSTUS IOANA	2/15/2010	\$150.00	P	SAN RAMON	CA	945825035	SAFEWAY, INC.	IT MANAGER
Report	REDMAN ANNE	3/29/2010	\$150.00	P	SEATTLE	WA	981447232	BENNETT BIGELOW + LEEDOM	LAWYER
Report	IRONS DI	6/7/2010	\$140.00	P	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT OF COMPANY

There are 2 General Election contributions on Page 9:

DEC 17 2010

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	IRONS DI	8/17/2010	\$140.00	G	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT OF COMPANY
Report	DE MICHELE BARBARA	8/10/2010	\$125.00	P	ISSAQUAH	WA	980273281	RETIRED	RETIRED
Report	IRONS DI	7/30/2010	\$110.00	P	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT OF COMPANY
Report	RHODES-BRUDWICK KATHTYN B	6/10/2010	\$105.00	P	ISSAQUAH	WA	980274256	ALPHA SUPPORTED LIVING SERVICES	SOCIAL SERVICES
Report	ALEXANDER DI	1/11/2010	\$100.00	P	FALL CITY	WA	980240850	CITY OF CLYDE HILL	POLICE OFFICER
Report	ALHADEFF KENNETH	6/29/2010	\$100.00	P	SEATTLE	WA	981042292	JUNKYARD DOG PRODUCTIONS	PRODUCER
Report	ANDERSON MICHAEL D	3/28/2010	\$100.00	P	KIRKLAND	WA	980341604	T-MOBILE	AUDITOR
Report	BECKER NATHALE D	12/31/2009	\$100.00	P	BOTHELL	WA	980214210	MICROSOFT	HUMAN RESOURCES
Report	BELENKY AARON	3/18/2010	\$100.00	P	RENTON	WA	980582070	K-FORCE	PROGRAMMER
Report	BELENKY AARON	7/30/2010	\$100.00	P	RENTON	WA	980582070	K FORCE	PROGRAMMER
Report	CLARK JEFFREY	6/3/2010	\$100.00	P	SEATTLE	WA	981993111	VERACITY ANALYTICS	CONSULTANT
Report	CLIBBORN JUDY	6/7/2010	\$100.00	P	MERCER ISLAND	WA	980403904	WASHINGTON STATE	STATE REPRESENTATIVE
Report	COHEN DAN	3/29/2010	\$100.00	P	OAKLAND	CA	946122947	FCP	PR
Report	CUADRA MIKE	8/17/2010	\$100.00	P	SEATTLE	WA	981034154	GASPAR'S CONSTRUCTION	CONSTRUCTION
Report	DILLON GAVIN	6/7/2010	\$100.00	P	ISSAQUAH	WA	980298808	T-MOBILE USA	DIRECTOR

Page 10 has no General Election Contributions.

There is one General Election contribution on Page 11:

Report	Name	Date	Amount	P/G	City	State	Zip	Employer	Occupation
Report	IRONS DI	8/17/2010	\$140.00	G	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT OF COMPANY
Report	DE MICHELE BARBARA	8/10/2010	\$125.00	P	ISSAQUAH	WA	980273281	RETIRED	RETIRED
Report	IRONS DI	7/30/2010	\$110.00	P	FALL CITY	WA	980240850	COMPOSITE AND CASTING SUPPLY, INC	PRESIDENT OF COMPANY
Report	RHODES-BRUDWICK KATHTYN B	6/10/2010	\$105.00	P	ISSAQUAH	WA	980274256	ALPHA SUPPORTED LIVING SERVICES	SOCIAL SERVICES
Report	ALEXANDER DI	1/11/2010	\$100.00	P	FALL CITY	WA	980240850	CITY OF CLYDE HILL	POLICE OFFICER
Report	ALHADEFF KENNETH	6/29/2010	\$100.00	P	SEATTLE	WA	981042292	JUNKYARD DOG PRODUCTIONS	PRODUCER
Report	ANDERSON MICHAEL D	3/28/2010	\$100.00	P	KIRKLAND	WA	980341604	T-MOBILE	AUDITOR
Report	BECKER NATHALIE D	12/31/2009	\$100.00	P	BOTHELL	WA	980214210	MICROSOFT	HUMAN RESOURCES
Report	BELENKY AARON	3/18/2010	\$100.00	P	RENTON	WA	980582070	K-FORCE	PROGRAMMER
Report	BELENKY AARON	7/30/2010	\$100.00	P	RENTON	WA	980582070	K FORCE	PROGRAMMER
Report	CLARK JEFFREY	6/3/2010	\$100.00	P	SEATTLE	WA	981993111	VERACITY ANALYTICS	CONSULTANT
Report	CLIBBORN JUDY	6/7/2010	\$100.00	P	MERCER ISLAND	WA	980403904	WASHINGTON STATE	STATE REPRESENTATIVE
Report	COHEN DAN	3/29/2010	\$100.00	P	OAKLAND	CA	946122947	FCP	PR
Report	CUADRA MIKE	8/17/2010	\$100.00	P	SEATTLE	WA	981034154	GASPAR'S CONSTRUCTION	CONSTRUCTION
Report	DILLON GAVIN	6/7/2010	\$100.00	P	ISSAQUAH	WA	980298808	T-MOBILE USA	DIRECTOR

In addition to the Donations labeled as for the General Election, there are also some donors who made multiple donations whose aggregate total exceeds the \$800 limit for the Primary.

We have therefore prepared a Table showing all the Donations where those donations have exceeded the \$800 limit for the Primary.

This Table is shown on the next page of this complaint.

PDC Complaint against Dean Willard and Dorothy Willard, Page 7 of 20

DEC 17 2010

The following Table is a summary of major contributors who exceeded the \$800 limit for the Primary and the dates of contributions and the pages they appear on the PDC site under Candidates, Legislative, 2010, page 3, Willard Details:

Name	Contribution Amount	Contribution Date	PDC Page #	For Primary/ General?	Amount failed to refund	PDC Violation #
Freese Michael	\$800	2/25	1	P		
Freese Michael	\$800	2/25	1	G	\$800	1
Lillie Elizabeth	\$800	4/21	2	P		
Lillie Elizabeth	\$800	4/22	2	G	\$800	2
WA Teamsters	\$800	7/23	2	P		
WA Teamsters	\$800	7/23	2	G	\$800	3
Willard Dorothy	\$800	12/29	2	P		
Willard Dorothy	\$800	12/29	2	G	\$800	4
Young Jim	\$800	2/19	3	P		
Young Jim	\$800	2/19	3	G	\$800	5
Mallahan Carolyn	\$600	6/16	3	G		
Mallahan Carolyn	\$500	1/23	4	P		
Mallahan Carolyn	\$300	2/28	5	P		
Mallahan Carolyn	\$200	2/28	7	G	\$800	6
Mallahan Joseph	\$500	1/23	4	P		
Mallahan Joseph	\$500	5/10	4	G		
Mallahan Joseph	\$300	2/28	5	P		
Mallahan Joseph	\$200	2/28	7	G	\$700	7
Medlin Matthew	\$800	12/28	2	P		
Medlin Matthew	\$500	3/23	4	G		
Medlin Matthew	\$300	6/22	5	G	\$800	8
Walker Lorin	\$500	2/08	4	P		
Walker Lorin	\$300	4/21	5	P		
Walker Lorin	\$250	6/07	6	G		
Walker Lorin	\$200	4/21	8	G	\$450	9
Lieweke Tara	\$800	12/31	2	P		
Liewiki Tara	\$200	12/31	7	G	\$200	10
Liewiki Toddd	\$800	12/31	2	P		
Liewiki Todd	\$200	12/31	7	G	\$200	11
Shirley Mary	\$800	7/14	2	P		
Shirley Mary	\$200	7/14	8	G	\$200	12
Shirley Jon	\$800	7/14	2	P		
Shirley Jon	\$200	7/14	8	G	\$200	13
Total Failed to Refund					\$7,550	

Dean Willard's failure to refund these General Election contributions were 13 violations of RCW 42.17.640 (14). In addition, each person who failed to get a refund of the amount contributed in excess of \$800 violated RCW 42.17.640 (2).

II. EVIDENCE THAT DEAN WILLARD SPENT \$7,550 of GENERAL ELECTION DONATIONS ON THE 2010 PRIMARY ELECTION

The following shows that **Dean Willard raised \$70,264 in Cash Contributions:**

CASH CONTRIBUTIONS		INKIND CONTRIBUTIONS		EXPENDITURES		INDEPENDENT SPENDING	
Cash Contributions for: WILLARD DEAN L				Contact Information		C1 Report	
Total Raised:	\$99,495.41	Total Spent:	\$87,174.72				
Total IE Supporting:	\$0.00	Total IE Opposing:	\$0.00				
(Cash Contributions	(Inkind Contributions	(Anonymous	(Personal	(Loans	(Miscellaneous	(Small Contributions	
\$70,264.55	\$2,362.86	\$0.00	\$22,000.00	\$4,700.00	\$0.00	\$253.00	

This \$70,264 included \$7,550 in General Election contributions and \$62,684 in Primary Election contributions. Mr. Willard also loaned his campaign \$4,700 and the total for In Kind Contributions was \$2,362.86. Mr. Willard also donated \$20,000 to his campaign – but not until September 10, 2010 – which he reported on September 20, 2010, more than one month after the Primary Election and more than one month and a half after his primary expenses were incurred.

From the same PDC page shown above, click on Dean Willard > Details > **Expenditures** confirms that Dean Willard spent \$87,174 on the 2010 Primary. The dates and amounts of all 2010 Primary expenses for Dean Willard are also listed on several pages in this section of the PDC website:

Building Confidence in the Political Process
pdc Public Disclosure Commission

HOME PUBLIC RESOURCES FILED RESOURCES SEARCH THE DATABASE VIEW ACTUAL REPORTS ONLINE FILING

CANDIDATES COMMITTEES INDEPENDENT SPENDING ADVANCED SEARCH

CASH CONTRIBUTIONS INKIND CONTRIBUTIONS EXPENDITURES INDEPENDENT SPENDING

Expenditures for: WILLARD DEAN L Contact Information C1 Report

Total Raised: \$99,495.41 Total Spent: \$87,174.72
 Total IE Supporting: \$0.00 Total IE Opposing: \$0.00

(Detailed Expenditures (Inkind \$67,980.33 \$2,362.86

Select an opponen

NOTE: Click on a column header to sort by that column, or click on the icon to filter your results

Drag a column header and drop it here to group by that column

Report	Name	Date	Amount	City	State	Zip	Description
Report	WINPOWER STRATEGIES	7/22/2010	\$5,167.04	SEATTLE	WA	981012130	PRINTING FEES
Report	CAPITOL CITY PRESS	7/14/2010	\$3,717.63	TUMWATER	WA	985128243	POSTAGE
Report	CAPITOL CITY PRESS	7/30/2010	\$3,643.48	TUMWATER	WA	985128243	POSTAGE
Report	CAPITOL CITY PRESS	8/20/2010	\$3,212.85	TUMWATER	WA	985128243	POSTAGE PAID #4

The total spent on the Primary **\$87,174** greatly exceeds the total of the Primary Donations (**\$62,684**) and the money Mr. Willard loaned his campaign before the Primary (**\$4,700**). The difference is about \$20,000 of expenditures – at least a portion of which were in fact impermissibly paid for **using \$7,550 in General Election Contributions.**

The final three C4's submitted by Dean Willard and his campaign Treasurer Dorothy Willard are further evidence that illegal General Election contributions were spent on Primary Election expenses.

The C4 submitted on September 10, 2010 shows Total Cash and In Kind Contributions of \$77,895.41 as of September 9, 2010.

 711 CAPITOL WAY RM 208 PO BOX 40988 OLYMPIA WA 98504-0988 (360) 753-1111 TOLL FREE 1-877-601-2828		SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES		C4 (3-97)	100378019 09/10/2010
Candidate or Committee Name (Do not abbreviate. Include full name) Dean Willard (Friends of Dean Willard)					
Mailing Address PO Box 368			City Issaquah, WA		
Zip + 4 98027-0015		Office Sought (Candidates) STATE REPRESENTATIVE		Election Date 2010	
Report Period Covered 08/10/10		To (end of period) 09/31/10		Final Report? Yes No X	

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)		\$		74,320.25
2. Cash received (From line 2, Schedule A)		\$	3,359.00	
3. In kind contributions received (From line 1, Schedule B)			216.16	
4. Total cash and in kind contributions received this period (Line 2 plus 3)				3,575.16
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)				77,895.41

Subtracting from 77,895.41 the General Election contributions of \$7,550 leaves **\$70,345.41 available to spend on the Primary Election.**

The bottom of Page 1 of the September 10th C4 report acknowledges \$70,321.09 in Primary Election expenses.

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)	
11. Total cash expenditures (From line 4, Schedule A)	
12. In kind expenditures (goods & services) (From line 1, Schedule B)	
13. Total cash and in kind expenditures made this period (Line 11 plus line 12)	
14. Loan principal repayments made (From line 2, Schedule L)	
15. Corrections (From line 2 or 3, Schedule C)	
16. Net adjustments this period (Combine lines 14 & 15)	
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16)	

CANDIDATES ONLY Name not on ballot				CASH SUMMARY	
Primary election <input type="checkbox"/>	Won <input type="checkbox"/>	Lost <input checked="" type="checkbox"/>	Unopposed <input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17)	
General election <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance]	
Treasurer's Daytime Telephone No.: (425) 657-0579				19. Liabilities: (Sum of loans and debts owed)	
				20. Balance (Surplus or deficit) (Line 18 minus line 19)	

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
Dean Willard	09/10/10	Dorothy Willard	09/10/10

DATE FILED PDC

But the real total of Primary Expenditures was much greater than the \$70,321.09 indicated on the September 10th C4 report. As was not revealed until the December 13th C4 Report, over \$5,000 in Primary Expenses were never reported on the September 10, 2010 C4 - in an apparent attempt to hide the total amount spent on the primary - and the fact that General Election contributions were spent on the Primary.

In addition, there were \$10,298.56 in outstanding obligations to pay for two Mailers which were mailed on or before August 8th. This was indicated on the September 10th C4 Page 1 as a portion of the \$14,998.56 in Liabilities (which also included a \$4,700 loan from Mr. Willard to his campaign). The obligation for the Mailers and Date incurred is more clearly listed in Part B of the September 10th C4. This brought the **total amount spent on the Primary to at least \$15,500 more than could have been covered by available Primary Election assets** - conclusive evidence that \$7,550 in illegal General Election contributions were spent on the Primary. :

Candidate or Committee Name (Do not abbreviate. Use full name) Dean Willard (Friends of Dean Willard)	Report Date 08/10/10 08/31/10
3. ORDERS PLACED, DEBTS, OBLIGATIONS. (Give estimate if actual amount not known. Exclude loans. Report loans on Schedule L.)	

Expenditure Date	Vendor's/Recipient's Name and Address	Amount Owed	Code OR	Description of Obligation
08/08/2010	Winpower Strategies 1402 3rd Avenue Suite 505 Seattle, WA 98101-2130	5146.24	G	Mailer #2
08/08/2010	Winpower Strategies 1402 3rd Avenue Suite 505 Seattle, WA 98101 2130	5152.32	G	Mailer #2

The Willards then submitted an additional C4 on December 11, 2010. The top half of Page 1 had significant unexplained changes when compared to the top half of the September 10th C4:

 711 CAPITOL WAY RM 206 PO BOX 40588 OLYMPIA WA 98504-0985 (360) 753-1111 TOLL FREE 1-877-691-2528	SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES	C4 (397)	100392963
			12 11 2010
Candidate or Committee Name (Do not abbreviate. Include full name) Dean Willard (Friends of Dean Willard)			
Mailing Address PO Box 368		City Issaquah, WA	
Zip + 4 98027-0015	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2010	*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?
Report Period Covered 10/26/10	From (last C-4) 11/30/10	To (end of period) Final Report? Yes No X	

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)	\$		97,895.41
2. Cash received (From line 2, Schedule A)	\$	1,600.00	
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).....			1,600.00
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)			99,495.41

First, Line 1 is supposed to have the exact same amount as Line 8 of the last C4 submitted on September 10, 2010. The correct entry should have been \$77,895.41. It turns out that there was an additional Deposit which Dean Willard made to his campaign on September 10th 2010. This \$20,000 personal donation was reported on a September 20, 2010 C3 form, but was NOT REPORTED in an October C4 form as required.

PDC Complaint against Dean Willard and Dorothy Willard, Page 11 of 20

DATE FILED PDC

Nor was the late arriving \$20,000 reported in a November C4 form.
Nor was it reported in the December 11, 2010 C4 form.

DEC 17 2010

In fact, it was not reported until a C4 report dated December 13, 2010. This delay of more than 2 months is further evidence of a deliberate attempt to hide both Primary Election expenses and a very large, but very late personal donation.

The bottom half of Page 1 on the December 11th C4 Report also has significant unexplained changes when compared to the bottom of the September 10th C4:

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)				
				87,039.48
11. Total cash expenditures (From line 4, Schedule A)				
				191.24
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).....				
				191.24
14. Loan principal repayments made (From line 2, Schedule L).....				
				0.00
15. Corrections (From line 2 or 3, Schedule C)..... Show + or (-)				
				-56.00
16. Net adjustments this period (Combine lines 14 & 15)..... Show + or (-)				
				-56.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16).....				
				87,174.72
CANDIDATES ONLY				CASH SUMMARY
	Won	Lost	Unopposed	Name not on ballot
Primary election	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Cash on hand (Line 8 minus line 17)				
				12,320.69
19. Liabilities: (Sum of loans and debts owed)				
				4,700.00
20. Balance (Surplus or deficit) (Line 18 minus line 19)				
				7,620.69
Treasurer's Daytime Telephone No.:				
(425) 657-0579				
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	
Dean Willard		12/11/10	Dorothy Willard	
			Date	
			12/11/10	

The biggest problem is Line 10. The amount is supposed to be the same as Line 17 of the September 10th C4 (\$70,321.07). Instead it is \$87,039.48. The unexplained difference is \$16,718.41. A portion of this difference was clearly the \$10,298.56 in outstanding obligations to pay for two Mailers which were mailed on or before August 8th. This debt appears to have been paid. But the two mailers were not listed as paid on Schedule A for this December 11th C4 report.

Instead, they were both included on the Schedule A form of an additional C4 Report submitted on December 13, 2010. **This December 13 C4 report for the first time fully disclosed several Primary expenses totally \$16,132.17 in additional campaign expenses, most of which were apparently paid for on September 10, 2010. (a copy of this December 13, 2010 Schedule A Form is on the next page).**

Note that in addition to paying for the second and third mailing, this A form also lists paying for something called "Mail Piece" on the same date. This expense, \$5,384.32, was never listed as a liability on the September 10, 2010 C4. Nor was it ever reported on any form before December 13, 2010. This Mail Piece expense must have occurred on or before August 8, 2010. Thus, it was not reported for more than 4 months!

PDC Complaint against Dean Willard and Dorothy Willard, Page 12 of 20

Assuming the December 13th C4 report is accurate, the Willard's hide more than \$5,000 in additional Primary campaign expenses for more than 4 months!

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	0.00
09/01/10	Regence Blue Shield PO Box 91011 Seattle, WA 98101-9111	K	Insurance Premium	212.00
09/10/10	Winpower Strategies 1402 3rd Avenue Suite 505 Seattle, WA 98101-2130	G	Mailpiece	5,384.32
09/10/10	Winpower Strategies 1402 3rd Avenue Suite 505 Seattle, WA 98101-2130	G	Mailer #3	5,152.32
09/10/10	Winpower Strategies 1402 3rd Avenue Suite 505 Seattle, WA 98101 2130	G	Mailer #2	5,146.24
09/22/10	Complete Campaigns 3635 Ruffin Road Floor 3 San Diego, CA 92123-1880	G	Backoffice	237.28

DATE FILED PDC

DEC 17 2010

4. TOTAL CASH EXPENDITURES Total from attached pages \$ 0.00
Enter also on line 11 of C4 \$ 16,132.17

Thus finally and for the first time explains the actual total of their Primary campaign expenses as shown on Line 17 of Page 1 which were \$86,453.26.

EXPENDITURES		
10. Previous total cash and in kind expenditures (From line 17, last C-1) (if beginning a new campaign or calendar year, see instruction booklet)		70,321.09
11. Total cash expenditures (From line 4, Schedule A)	16,132.17	
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).....	16,132.17	
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).....	86,453.26	

CANDIDATES ONLY				Name not on ballot		CASH SUMMARY	
Won	Lost	Unopposed					
Primary election	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	18. Cash on hand (Line 8 minus line 17)	11,442.15	
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	[Line 18 should equal your bank account balance(s) plus your petty cash balance]		
Treasurer's Daytime Telephone No.:				19. Liabilities: (Sum of loans and debts owed)	4,700.00		
(425) 637-0579				20. Balance (Surplus or deficit) (Line 18 minus line 19)	6,742.15		

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
Dean Willard	12/13/10	Dorothy Willard	12/13/10

This expense was much more than the \$70,000 in Primary Campaign expenses that they indicated in their September 10th C4 Report. It was even way more than the \$80,000 in expenses had the obligation for two of the mailers been properly included. The purpose of this 4 months of evasion was clearly to hide the fact that \$7,550 in illegal General Election contributions had been used to pay for Primary expenses. This was done by making the Primary contributions look as high as possible while making the Primary expenses look as low as possible.

Trying not only to buy an election, but also trying to hide the fact that the election was being bought:

DEC 17 2010

The primary purpose of the Public Disclosure Laws are to allow the voters to make an informed decision about who they might want to vote for, who might be trying to buy votes and how much any candidate is spending or contributing to their campaign. It subverts the primary purpose of the Public Disclosure Law to have thousands of dollars in campaign expenses hidden until 4 months after they occurred and 4 months after the election. It also subverts the purpose of full disclosure for a candidate to hide a \$20,000 personal contribution to his own campaign until a month after the election is over. At the time of the Primary, the voters were misled into believing that Dean Willard had only spent \$67,000 when he had actually spent \$86,000 trying to buy their votes. The voters were also misled into believing that Dean Willard had only loaned his campaign \$4,700, when in fact he had spent \$24,700 of his own money trying to buy their votes. Had either of these facts been made public before the August Primary, it is possible that many voters who voted for Mr. Willard would have voted for someone else.

It should be recognized that Dean and Dorothy Willard also managed to funnel \$5,000 in illegal "low cost fund raiser" donations through their control of the Board of the 5th District Democrats. Because Dorothy Willard was the Treasurer of the 5th District Democrats and because they were both on the Board of the 5th LD Dems – which was controlled by their supporters, they were able to use the 5th District Democrats Bank Account as their own personal piggy bank in which they hide \$5,000 in illegal donations. While this matter is discussed in a separate complaint against Dorothy Willard and Jennifer Sutton, the Chair of the 5th District Democrats, it should be recognized that the total illegal donations were **not merely \$7,550 in General Election contributions, but also included an illegal \$5,000 contribution from the 5th LD Democrats – for a total of \$12,550 in illegal contributions** – all of which was then used to fund hidden and/or unreported campaign expenses (3 mailers) which totaled more than \$15,000.

The cumulative effect of all 3 illegal contributions to Mr. Willard's campaign (\$5,000 from the 5th Dems in August, \$7,550 in General Election funds and \$20,000 in a deliberately delayed personal donation for a total of \$32,750 – and the last minute surprise attack the \$32,750 funded should be seen in the light of Mr. Willard's July 26, 2010 C4 Report. This report indicated that Mr. Willard had donations of \$64,000 and had already spent \$48,000 on various campaign managers and consultants. This left a balance of \$15,256 on July 26th - the day the ballots were mailed out. However, \$7,550 of this \$15,256 were General Election Contributions which were only supposed to be spent if Mr. Willard made it past the Primary. Thus, the real balance was only \$7,800. Mr. Willard also had significant fixed costs for his office and staff of over \$4,800 which had not been fully reported. This left an actual balance of only \$3,000 on July 26th.

Based on this knowledge, Mr. Willard's opponents could reasonably assume that, at most, Mr. Willard would be able to send out ONE MAILER. Imagine our shock and amazement when folks in my precinct received up to **THREE mailers from Mr. Willard's campaign during the next two weeks! Mr. Willard went on a last minute media blitz with no money in his campaign to pay for it all.** We could not figure out how he was paying for all of these expensive mailers.

Even after finding out that he got \$5,000 from the Board of the 5th, this only left us wondering where the Board of the 5th Dems had suddenly gotten an extra \$5,000. **In fact, it was not until December 13th that things finally became clear. Mr. Willard had broken Public Disclosure Laws to the amount of \$32,500 (\$5,000 from the 5th Dems, \$7,550 from the illegal General Election contributions and \$20,000 in a last minute unreported personal contribution to his campaign.**

DATE FILED FOR

It clearly took careful planning over the months of June and July to pull off this "last minute August Surprise." All three mailers were large, slick 2 sided, full color brochures which must have been designed and produced weeks in advance. Below is an example of the front and back of one of Mr. Willard's mailings (the original was 8 1/2 x 11):

DEC 17 2010

ENDORSED BY:

- 5th Legislative District Democrats
- Washington State Labor Council (AFL-CIO)
- Washington Education Association
- Seattle King County Building and Construction Trades Council
- Aerospace Machinists Industrial District Lodge 751 (Boeing Machinists)
- Washington Conservation Voters
- American Federation of Teachers (AFT)
- Washington King County Democrats
- Rep. Judy Clibborn, 41st LD
- Rep. Lynn Springer, 45th LD
- Tek-Marts - Issaquah City Councilmember
- Mark Muller - Issaquah City Councilmember and many more.



ABOUT DEAN:

- Former Vice-President at T-Mobile USA
- Board Vice-President Seattle Youth Symphony Orchestra
- Sleeping Committee Member, Treehouse Golf, Kids Golf Tournament

WWW.DEANWILLARD.COM
Call (206) 425-3148

PRINTED ON RECYCLED PAPER

ECRLOT™ R 007

North Bend WA 98045

Paid for by Friends of Dean Willard - PO Box 368, Issaquah WA, 98027-9607

Dean Willard
for State Representative District #5



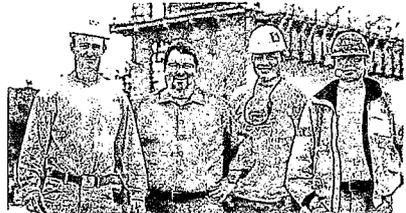
These are challenging times with high unemployment and crippling state budget problems. Too often, politicians have not shown the needed courage or ability to work together to solve our toughest problems.

I'll bring my business background and dedication to bringing people together to get results creating jobs, improving transportation and championing our public schools.

— Dean Willard

WWW.DWILLARD.COM

Elect Dean Willard for State Representative LD #5



CREATING JOBS

I believe Washington State can be one of the best places in the world to run a business. As a former Executive at T-Mobile and now as small business owner, I believe I have the firsthand experience to help our state become more competitive.

MAKING STATE GOVERNMENT WORK

We need a new approach to state government. Too often, elected officials have attacked government to score cheap political points. Our elected officials need to work harder to build trust in government by engaging in civil discussions, reducing partisan bickering and making government work for the people of Washington State.



CHAMPIONING OUR PUBLIC SCHOOLS

We should remember that many of us live here because of our excellent public schools. I am committed to our public schools to ensure that kids in our community will succeed at higher education institutions and beyond.

As a technology business executive, I know our kids are not getting the math and science education they need to compete in our global economy. Let's continue to reform our K-12 system with stronger accountability, a better ability to retain and recruit quality teachers and a higher prioritization for funding within the state's budget. We have to reduce the number of kids (currently at 25% statewide) that are not graduating from high school.

WWW.DEANWILLARD.COM

Mr. Willard clearly knew in advance where the huge amount of last minute money would come from to pay for all three of these mass mailings. The only ones being deliberately kept in the dark by this plan were the voting public and Mr. Willard's Primary opponents.

Mr. Willard's \$32,550 in unreported or mis-reported campaign contributions and \$86,000 in total Primary expenses should also be put into context of what the other two candidates for the 5th LD Position 2 spent during the 2010 Primary. **Mr. Willard spent a near record amount for a Primary challenger to spend on a Primary.**

The incumbent, Glenn Anderson's expenses for the Primary, as reported on his September 8th C4 were just over \$30,000.

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)	30,511.84
11. Total cash expenditures (From line 4, Schedule A)	0.00
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)	0.00
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)	30,511.84

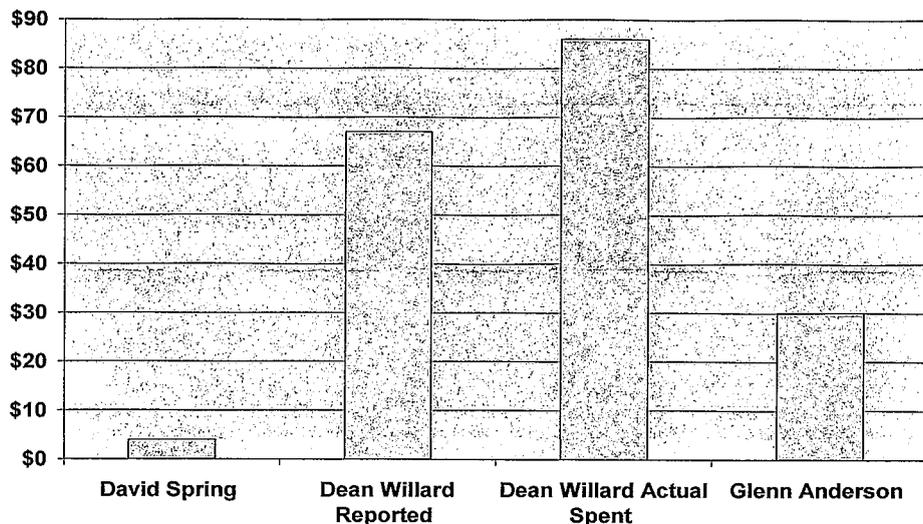
The other Democratic challenger, David Spring's expenses as reported on his C4 were under \$4,000:

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)	3,804.83
11. Total cash expenditures (From line 4, Schedule A)	0.00
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)	0.00
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)	3,804.83

The following chart shows how much more Mr. Willard spent than the other two candidates. Since it was a Top Two Primary, the most relevant part of this graph is how much more Mr. Willard spent compared to the other Democratic candidate, Mr. Spring. The amount of campaign expenses hidden by Mr. Willard was four times the total amount spent by Mr. Spring.

Even the amount of illegal General Election contributions Mr. Willard spent in the Primary (nearly \$8,000) was twice the entire amount spent by Mr. Spring.

Mr. Spring spent all of his time on an old fashioned low cost Door to Door campaign:



PDC Complaint against Dean Willard and Dorothy Willard, Page 16 of 20

DEC 17 2010

Despite his blatant attempts to deceive and mislead the voters regarding the amount of money he was spending and where it was coming from, Dean Willard got only 17% of the vote, or 5,535 votes on the August 2010 Primary:

Legislative District 5, State Representative Pos. 2 (Partisan office, 2-year term)		Last updated on 9/1/2010 12:18 PM	
Candidate		Vote	Vote %
David Spring	(Prefers Democratic Party)	8,144	25.05 %
Dean Willard	(Prefers Democratic Party)	5,535	17.03 %
Glenn Anderson	(Prefers Republican Party)	18,827	57.92 %
Total Votes		32,506	100.00 %

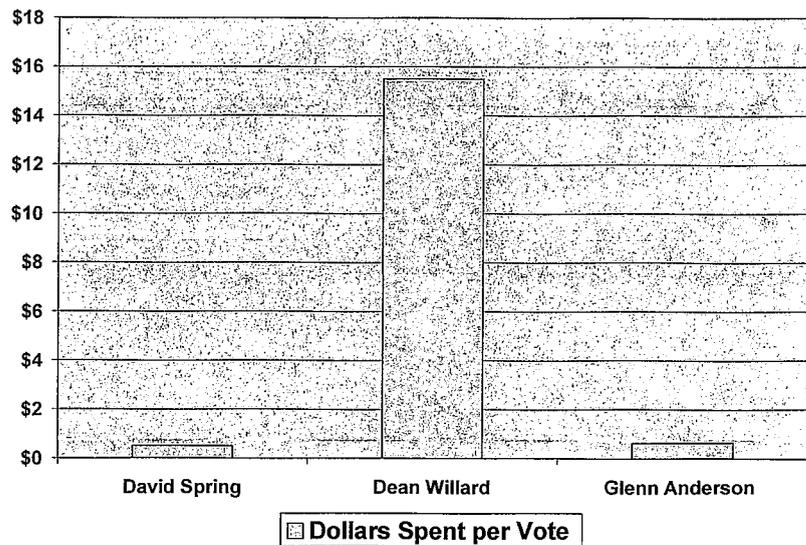
But the real measure of how much Mr. Willard tried to buy the election comes from looking at how much money he spent per vote trying to buy the election.

The graph to the right shows the amount of money spent per vote received by all three candidates.

Mr. Spring spent less than 50 cents per vote.

Mr. Anderson spent a little over 60 cents per vote.

But Mr. Willard spent nearly \$16 per vote!



SUMMARY OF VIOLATIONS BY DEAN AND DOROTHY WILLARD

We assert that Mr. Willard's failure to refund the \$7,550 in General Election contributions of 13 donors represents 13 separate violations of **RCW 42.17.640, Section 14** (see below for copies of applicable laws).

We further assert that Mr. Willard's spending those illegal General Election contributions on the Primary was a violation of RCW 42.17.640.

We further assert that failing to report the \$5,384.32 for "Mailpiece" until December 13, 2010 was a violation of RCW 42.17.080 Section C.

We further assert that failing to report a contribution of \$20,000 until December 13, 2010 was also a violation of RCW 42.17.080 Section C as well as a violation of RCW 42.17.105 in that it was intended to pay for \$15,000 in mailers sent out at the beginning of August just as the ballots were sent out. Neither the very large expense nor the very large contribution was reported for 4 months.

In conclusion, we believe that Dean and Dorothy Willard had at least 16 violations of State law in their efforts to mislead the voters during the 2010 Primary.

DEC 17 2010

PDC Complaint against Dean Willard and Dorothy Willard, Page 17 of 20

Relief Requested

RCW 42.17.390

Civil remedies and sanctions. (*Effective until January 1, 2012.*)

One or more of the following civil remedies and sanctions may be imposed by court order in addition to any other remedies provided by law:

(3) Any person who violates any of the provisions of this chapter may be subject to a civil penalty of not more than ten thousand dollars for each such violation. **However, a person or entity who violates RCW 42.17.640 may be subject to a civil penalty of ten thousand dollars or three times the amount of the contribution illegally made or accepted, whichever is greater.**

(4) Any person who fails to file a properly completed statement or report within the time required by this chapter may be subject to a civil penalty of ten dollars per day for each day each such delinquency continues.

(5) Any person who fails to report a contribution or expenditure as required by this chapter may be subject to a civil penalty equivalent to the amount not reported as required.

We ask that the PDC find Dean Willard and Dorothy Willard in violation of **RCW 42.17.060, RCW 42.17.080 and/or RCW 42.17.105.**

If the PDC finds that there is sufficient evidence to conclude that these errors and omissions represented a deliberate attempt to mislead the voters by hiding over \$5,000 in campaign expenses and/or misusing \$7,550 in General Election contributions and/or delaying the reporting of \$20,000 in late campaign contributions, then we further ask, per **RCW 42.17.390 (3)**, that Dean Willard and Dorothy Willard be subject to a civil penalty of three times the amount of the illegally accepted General Election contribution (or **\$7,550 time 3 = \$22,650**).

In the alternative, or in addition to this civil penalty, we ask that Dean Willard and Dorothy Willard be required to REFUND all contributions in excess of the Primary Limit of \$800 to the 13 individuals who illegally contributed more than \$800 to their campaign.

We further ask per **RCW 42.17.390 (5)** that Dean Willard and Dorothy Willard be fined a civil penalty of the entire amount of the Primary expenditure of **\$5,384.32** which was incurred in July 2010, but was not disclosed until December 13, 2010.

We further ask per **RCW 42.17.390 (5)** that Dean Willard and Dorothy Willard be fined a civil penalty of **\$20,000** for failing to report a large late donation of \$20,000 on a C3 until September 20, 2010 and failing to report this donation on a C4 until December 13, 2010.

To indicate the seriousness of all of these 16 violations, the total amount of civil penalties could be as high $\$22,650 + \$5,384.32 + \$20,000 = \$48,034.32$.

We ask these fines and civil penalties be imposed so that Dean and Dorothy Willard are not allowed to financially or politically benefit from their deceptive and deliberate money laundering scheme - and to reduce the likelihood that the Willards or other wealthy candidates will make another attempt to deceive or mislead the voters in the future.

Sincerely,

David R. Olson and Elizabeth D. Olson