

SEP 26 2011

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

Christie True, Director, Department of Natural Resources and Parks, King County

King Street Center, 201 S. Jackson St., Room 700, Seattle WA 98104-3855

Email: christie.true@kingcounty.gov, Phone: 206-296-6500

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.

Christie True sent a letter, on King County stationery, to the Woodinville Water District, in which she criticizes *by name* two candidates for water district commissioner. She writes in this letter, "Of particular concern are the inaccurate assertions being made about King County's Wastewater Treatment Division (WTD) by two candidates campaigning for commissioner positions at the Woodinville Water District, Jack Vermeulen and Hank Stecker." It is one thing for a county official to respond to inquiries from the water district and clarify issues. It is quite another to name specific candidates for office and accuse them of "inaccurate assertions". To insert King County into an active campaign for political office in this manner is a clear violation of RCW 42.17.130, which prohibits any public employee from using "any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office".

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.

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.

Article from Woodinville Patch web site (attached and at <http://woodinville.patch.com/articles/county-officials-and-candidates-speak-out-on-brightwater-and-sewers>). Web site of Karen Steeb, one of the incumbent commissioners, quoting and highlighting Christie True's letter for political purposes, including a scanned copy of the letter from Christie True (attached and at <http://www.karensteeb.com/truth-about-sewers.html>).

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.

The attached evidence is readily available online for anyone to see.

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) Toby Nixon

Street address 12113 NE 141st Street

City, state and zip code Kirkland WA 98034-1411

Telephone number (including area code) 206-790-6377 (mobile)

E-mail address (optional) toby@tobynixon.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 *Toby L. Nixon*

Date signed 26 September 2011

Place signed (city and county)

Kirkland

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."*