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SEP 28 2011

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: Anita C'Neil

Your printed name: Anita C'Neil

Street address: 9302 SE Shoreland Drive

City, state and zip code: Belleuve, WA 98004

Telephone number: 425-454-2578

E-Mail Address: (Optional) askooq@gvakm.com

Date Signed: Sept. 28, 2011

Place Signed (City and County): Belleuve / King

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."

Anita C. Neil
9302 SE Shoreland Drive
Bellevue, WA 98004
425-454-2578

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September 28, 2011

Phil Stutzman
Director of Compliance
Public Disclosure Commission
PO Box 40908
OLYMPIA, WA 98504-0908

Sent via email to: Phil.Stutzman@pdc.wa.gov;pdc@pdc.wa.gov

Dear Mr. Stutzman,

Thank you for your response of August 29, 2011 to my complaint about the Stokes campaign. While I understand that the Public Disclosure Commission has determined that the nature of the complaint did not require an investigation, I am concerned that the PDC's failure to investigate the matter has emboldened Mr. Stokes to continue to ignore Washington's campaign finance laws. I respectfully request that the PDC conduct an investigation into the Stokes campaign's ongoing failure to comply with basic reporting requirements. Please consider this a separate complaint filed pursuant to RCW 390-37-040.

I would first note that, in my response to my prior complaint, Mr. Stokes acknowledged that he had failed to comply with the PDC's regulations for over a month and assured the PDC that he would come into compliance. I suspect this *mea culpa* is the reason that the PDC took no further action on an admitted violation. Mr. Stokes holds himself out to be a retired attorney, though the Washington State Bar Association has no record of him. This alone is of concern to me. But of greater concern is the fact that he continues to hide the financial details of his campaign from the public.

In early August, Bellevue residents began receiving "robo-calls" that asked about whether they would vote for Mr. Stokes. When they indicated their support for Mr. Stokes' opponent, Aaron Laing, the "robo-caller" proceeded to say negative, defamatory things about Mr. Laing. Shameful. The last thing our community needs is more negativity surrounding our Council. Even more shameful is the fact that the Stokes campaign has failed to report this expenditure to the PDC. From doing a little online research, it appears that "robo-calling" costs a minimum of \$500 and can be upward of many thousands of dollars. Whatever the cost, Mr. Stokes has yet to report it.

Since the launch of his campaign, Mr. Stokes has maintained a website at www.johnstokes.org. This website has been repeatedly updated and enhanced and is clearly the work of a skilled web designer. From personal and professional experience, I know that websites typically cost a minimum of \$1,000 to set up, and there are monthly maintenance fees. Looking at other Bellevue Council candidate filings, the others have spent over \$1,000 on their websites year-to-date. Mr. Stokes has yet to report this expenditure.

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At the end of August, the Stokes campaign began placing multi-colored corrugated plastic yard signs throughout Bellevue. Online research of various local print shops shows that such signs cost about \$ 6 each and that prices are lower the more one buys. Two hundred color, corrugated plastic signs like those used by the Stokes campaign cost about \$1, 200. Mr. Stokes has not reported his sign expenditures, which could be in the thousands of dollars without graphic design costs.

Also at the end of August, the Stokes campaign sent out a mailing to an unknown number of recipients on professionally designed postcards, and the Stokes campaign has been distributing glossy, color doorbell cards for the last month, too. Other candidates have reported over \$1,000 for print costs for doorbell pieces. Again, there is no report of the cost of the printing, mailing or the graphic design for the postcards or the doorbell pieces.

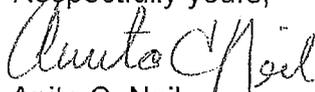
Finally, and perhaps most egregious, is that Mr. Stokes has been telling people since late June that his campaign consultant is Mr. Christian Sinderman of Northwest Passage Consulting. Mr. Sinderman has been seen at campaign-related events. Mr. Sinderman is reputedly one of the most experienced and expensive campaign consultants in Washington. Looking at the Northwest Passage Consulting website, it appears that Mr. Sinderman has an expansive client list.

The PDC records for one of Mr. Sinderman's recent clients, Maurice Classen (2011 Seattle City Council candidate), shows that Northwest Passage Consulting charges a \$2,500 retainer and provides mail, graphic design and other communication services at an additional handsome price (the Classen campaign spent over \$10,000 on Northwest Passage Consulting's services from March to August). The Stokes campaign has failed to report any expenditure for Northwest Passage Consulting, which could be in the many thousands of dollars, in light of all of all of the other unreported expenditures.

In sum, the Stokes campaign has not reported a significant number of campaign expenditures since the first week of July, and it failed to report expenses incurred as far back as June. The reporting rules require that expenditures must be reported when the expense is incurred, including in-kind contributions. The PDC instigated a formal investigation and fined a Bellevue Councilmember for this very same omission during the 2009 election cycle (PDC Case #10-029). I expect the PDC to do the same in this instance.

Ballots are set to drop in less than a month. I ask that the PDC conduct a prompt and thorough investigation into the Stokes campaign's ongoing and apparently deliberate failure to report what is likely many thousands of dollars of campaign expenditures, going back to June.

Respectfully yours,


Anita C. Neil

P.S. Supplementary information such as photos of campaign materials to follow, as become available to email.