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SEP 27 2011

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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

(See Appendix A, Question #1, attached)

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 law that pertains to this complaint is RCW 42.17.130, which states, "No elective official nor any employee of his [or her] office nor any person appointed to or employed by any public office or agency may use or authorize the use of any 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, or for the promotion of or opposition to any ballot proposition."

This complaint alleges that, on multiple occasions during 2009 and 2010, employees of Spokane Public Schools (District 81) in Spokane, WA, used district resources to assist in the promotion of ballot propositions, and that, on multiple occasions in 2011, employees of District 81 used district resources to assist in the campaign of a school board candidate.

(See Appendix A, Question #2, attached, which contains detailed documentation of the dates, times, places and acts that occurred.)

Evidence and Witnesses

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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.

With regard to the allegation that Spokane Public Schools (District 81), including members of the Board of Directors, the employees and agents of the School District, have campaigned for passage of a ballot proposition, or authorized the use of district facilities (directly or indirectly) for passage of a ballot proposition – see list of violations in Appendix A: School Levy Issues; the attached documents titled 3a, "Evidence Pertaining to the School Levy"; the enclosed CD "Levy Emails"; the list of violations in Appendix B; and the attached documents titled 3c, "Evidence Pertaining to the 2009 bond/levy campaign." With regard to the allegation that employees and agents of Spokane Public Schools (District 81) engaged in campaigning for the election of a board director for Spokane Public Schools, see the list of Violations in Appendix A: School Board Candidate Issues, and the attached documents titled 3b, "Evidence Pertaining to Campaigning for the Election of a School Board Member."

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 names and contact information for persons who have knowledge of the actions taken by, or on behalf of the Spokane School board and its employees and agents are partially contained at Appendix A, Question #4, "Witnesses," which is attached hereto, but also within an extremely broad swath of the school district directory and also within the parent and business community at large. The sum total is too large to list here.)

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Certification

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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) Laurie H. Rogers

Street address P.O. Box 48151

City, state and zip code Spokane, WA, 99228

Telephone number (including area code) 509-599-0913 (cell)

E-mail address (optional) wlroge@comcast.net

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 Laurie Rogers

Date signed September 26, 2011

Place signed (city and county)

Spokane, WA Spokane, WA

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."