



State of Washington
PUBLIC DISCLOSURE COMMISSION

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October 15, 2012

Sent via email and regular mail

DANIEL T. SATTERBERG
Prosecuting Attorney
Office of the Prosecuting Attorney – Civil Division
W400 King County Courthouse
516 Third Avenue
Seattle, WA 98104

RE: Washington State Public Disclosure Commission Recommendation Following Staff Report of Investigation on Citizen Action Letter Concerning Inslee For Governor Campaign, PDC Case No. 13-011

Dear Mr. Satterberg:

On August 24, 2012, your office received a citizen action letter submitted by Randy Pepple, campaign manager for Friends of Rob McKenna (McKenna for Governor), alleging violations of the state's campaign finance disclosure laws by the Inslee for Governor Campaign.

Mr. Pepple's letter was submitted to your office pursuant to RCW 42.17A.765. It was also submitted to the Attorney General's Office on August 27, and had previously been submitted to our office on August 23, 2012. The Attorney General's Office advised the PDC on August 28, 2012 that it would not be participating in providing legal advice or representation in this matter. Your office forwarded Mr. Pepple's letter to the PDC on August 30, 2012, for investigation and possible other action. This letter provides the Commission's recommendations to you.

At a special meeting of the Commission held on October 15, 2012, the Commissioners reviewed the PDC staff investigation and the PDC staff recommendation. A copy of the report of investigation is being provided to your office, along with an executive summary and staff analysis.

The Commission considered the investigation and staff analysis, which showed that the Inslee for Governor campaign properly obtained permission from donors to the Inslee for Congress campaign prior to transferring contributions from the congressional

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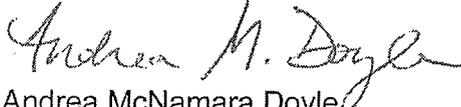
campaign accounts to the gubernatorial campaign account, and that the transferred contributions were eligible for transfer under the applicable "First In, First Out" accounting procedures. The staff investigation and analysis also showed that Mr. Inslee was not a candidate for governor subject to PDC registration and reporting requirements in January or April, 2011, as alleged by the complaint.

Further details of the staff analysis are provided in the executive summary of Phil Stutzman, Director of Compliance, to the Commissioners.

The Commission accepted the PDC staff recommendation to dismiss the allegations in the complaint and recommend to you that no further action be taken with regard to the citizen action letter.

If you have any questions, please contact me at (360) 664-2735. Thank you.

Sincerely,



Andrea McNamara Doyle
Executive Director

C: John Gerberding, Sr. Deputy Prosecuting Attorney
Commissioners
Nancy Krier, General Counsel
Greg Jackson, Special Counsel for the Commission
Inslee for Governor Campaign
Linda Dalton, Sr. Assistant Attorney General (*courtesy copy only*)