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Of Counsel Lawrence Schwerin

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Sent via email to judyg@atg.wa.gov

November 17, 2017

RECEIVED

11/17/2017

ATTORNEY GENERAL'S OFFICE

Campaign Finance Unit

Bob Ferguson
Attorney General
Washington State Attorney General's Office
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

RE: Notice of Violations of RCW 42.17A (Bob McCaslin)
SCBIL File No. 6552-021

Dear Mr. Ferguson:

On behalf of the Washington State Democratic Party, we write to notify you that there is good reason to believe several violations of the Fair Campaign Practices Act, RCW 42.17A et seq., have been committed by State Representative Bob McCaslin and Representative McCaslin's authorized political committee (the "Respondents"). Please consider this our 45-day notice pursuant to RCW 42.17A.765(4).

This notice details several violations of Washington's campaign finance law committed by Respondents, as set forth below.

Respondents filed several untimely C-4 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit A.

Respondents also failed to timely deposit contributions received pursuant to RCW 42.17A.220, as set forth in Exhibit B.

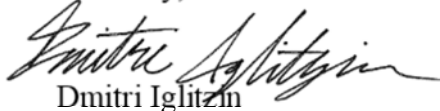
Further, Respondents filed several untimely C-3 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit C.

The laws regulating the reporting of campaign contributions serve a critical role in promoting transparency and ethical conduct in our elections. Respondents' disregard for these laws show an unacceptable lack of commitment to the principles our campaign finance laws uphold.

Bob Ferguson
November 17, 2017
Page 2 of 2

Please be aware that if you do not initiate an action against Respondents within the applicable statutory notice periods, we intend to satisfy any applicable notice requirements and proceed with an action in the name of the State. Please do not hesitate to contact us if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dmitri Iglitzin".

Dmitri Iglitzin

Counsel for Washington State Democrats

Enclosures

cc: Linda Dalton, Assistant Attorney General
Thurston County Prosecutor
Spokane County Prosecutor

Exhibit A – Late Reported C4s

1. December 11, 2015, form C-4 report(s) 100671876

This report, for the October 2015 filing period, was apparently due by November 10, 2015.

2-7. December 18, 2016, form C-4 report(s) 100709030; 100709031; 100709037; 100709038; 100709039; 100709040; 100709041

These reports, for filing periods ranging from December 2015 to June-July 2016 were all filed on December 18, 2016; ranging from four to nearly twelve months overdue.

	A	B	C	D	E	F
1	Exhibit B -- Illegally Late Deposited Contributions					
2						
3	Violation	Report	Deposit	Number of	Total \$	Additional Notes
4	1	<u>100671868</u>	9/25/15	2	200	(This report includes a \$300 donation by Duane Alton with no employer / occupation information)
5	2	<u>100671870</u>	10/1/15	1	950	
6	3	<u>100709023</u>	5/3/2016	1	500	
7	4	<u>100709027</u>	7/13/16	1	500	
8	5	<u>100725916</u>	10/11/16	2	1250	

Exhibit C -- Illegally Late Reported C3s

Violation #	Report #	Deposit Date	Report Due Date (approx.)	Date Reported	Dates Late (approx.)	Amount of Deposit
1	<u>100671867</u>	9/8/2015	10/10/2015	12/11/2015	62	\$700.00
2	<u>100671868</u>	9/25/2015	10/10/2015	12/11/2015	62	\$500.00
3	<u>100671869</u>	10/1/2015	11/10/2015	12/11/2015	31	\$50.00
4	<u>100671870</u>	10/1/2015	11/10/2015	12/11/2015	31	\$950.00
5	<u>100671871</u>	10/14/2015	11/10/2015	12/11/2015	31	\$1,000.00
6	<u>100709021</u>	4/14/2016	5/10/2016	7/18/2016	69	\$100.00
7	<u>100709022</u>	4/28/2016	5/10/2016	7/18/2016	69	\$50.00
8	<u>100709023</u>	5/3/2016	6/10/2016	7/18/2016	38	\$700.00
9	<u>100709024</u>	5/26/16	6/10/2016	7/18/2016	38	\$200.00
10	<u>100709025</u>	6/24/2016	7/1/2016	7/18/2016	17	\$1,200.00
11	<u>100709026</u>	7/5/2016	7/12/2016	7/18/2016	6	\$2,200.00
12	<u>100725915</u>	9/29/2016	10/6/2016	10/12/2016	6	\$1,250.00
				Totals	460	\$8,900.00