Schwerin Campbell Barnard Iglitzin & Lavitt LLP

ATTORNEYS AT LAW

Of Counsel Lawrence Schwerin

DMITRI IGLITZIN iglitzin@workerlaw.com

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 (Jim Honeyford)

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 Senator Jim Honeyford and Senator Honeyford'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 report contributions received pursuant to RCW 42.17A.220, as set forth in Exhibit B.

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.

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

Bob Ferguson November 17, 2017 Page 2 of 2

proceed with an action in the name of the State. Please do not hesitate to contact us if you have any questions.

Sincerely,

Dinitri Iglitzin

Counsel for Washington State Democrats

Enclosures

cc: Linda Dalton, Assistant Attorney General

Thurston County Prosecutor Yakima County Prosecutor

Exhibit A – Late Reported C4s

1-5. May 29, 2014 (form C-4 reports numbered **100581021**; **100581022**; **100581023**; **100581024**; **100581028**):

These reports, for filing periods December 2013, January 2014, February 2014, March 2014, and April 2014, were all filed on May 29, 2014. All were past their apparent due date by no less than 19 days at the least, 138 days at the most.

	Α	В	С	D	E	F	G
1							
2	Exhibit B Illegally Late Reported C3s						
	Violation			Report Due	Date	Dates Late	Amount of
3	#	Report #	Deposit Date	Date	Reported	(approx.)	Deposit
4	1	100788452	11/9/2016	12/12/2016	9/22/2017	284	\$500.00
5	2	100788451	8/31/2016	9/6/2016	9/22/2017	381	\$250.00
6	3	100788450	8/24/2016	8/29/2016	9/22/2017	389	\$1,500.00
7	4	100788449	7/26/2016	8/1/2016	9/22/2017	417	\$500.00
8	5	100788448	11/28/2015	12/10/2015	9/22/2017	652	\$600.00
9	6	100788447	11/11/2015	12/10/2015	9/22/2017	652	\$2,100.00