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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 (Chelan County Republican Central  
Committee)  
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 the Chelan County Republican Central Committee (the "Respondent"). 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 the Respondent, as set forth below.

**1) Failure to Report Contributions**

Respondent has failed to submit a single C3 report in 2014, 2015, 2016, and 2017, despite strong evidence that they have received many contributions and raised other funds during this period, and despite having selected the "full reporting" option (according to the C1Pc available on the PDC's website). [Respondent's website advertises the "Chelan County Lincoln Day Dinner"](#) hosted by the Chelan County Republican Central Committee, including an option to purchase tickets online or to mail checks made out to "CCRCC." The website includes several other events at which donations were likely solicited, including the Chelan County Republican Convention (March 30, 2016), and an open-house event (June 27, 2016). Additionally, there is an [active "Donate" page on Respondent's website](#), through which members and supporters have undoubtedly submitted contributions during the period in which no C3s have been filed.

## **2) Failure to Accurately, Timely, and Completely Report Expenditures & File C4 Reports**

State law requires that candidates and committees file frequent, accurate, and timely reports of expenditures. Respondent failed on numerous occasions to do this. Most egregiously, the Respondent did not file a single C4 report from 2014-2016 despite strong evidence that many expenditures were incurred during this period. As mentioned above, [the 'Events' page of Respondent's website](#) describes several events that would have necessitated expenditures. It have also had an active web presence during that time (which requires web hosting fees and possibly other related expenses).

Additionally, the Respondents filed [nine C4 reports on October 6, 2017; eight of which were filed illegally late for earlier months in 2017](#). These reports detail thousands of dollars of expenditures that went unreported for as many as nine months. Additionally, the Respondents illegally failed to break down many of the expenses filed in these reports, often writing only single words in the description section such as ["Refund"](#) (without detailing what the refund was for) or ["Broadcasting"](#) (without indicating whether this was in support of a candidate or campaign). This failure to report accurately, thoroughly, and in a timely matter suggests either remarkable carelessness or a malicious concealing of these expenses and their nature.

## **4) Failure to list committee officers**

The Respondents failed to list any individuals as officers, as required by RCW42.17A.205(2)(c) on the [C1PC form filed in 2017](#) other than their Treasurer and a first-name only entry for "Fred" under the campaign manager section of the form. They do, however, list the following officers [on Respondent's website](#):

- Fred Simpson; Chairman
- Jim Blair; Vice Chairman
- John Lafer; State Committeeman
- Marcy Collins; State Committeewoman
- Ellie Ownbey; State Committeewoman

WAC 390-05-245 defines committee officer as: "...any person designated by the committee as an officer on the C-1 or C-1pc registration statement and any person who alone or in conjunction with other persons makes, directs, or authorizes contribution, expenditure, strategic or policy decisions on behalf of the committee."

## **5) Illegal unauthorized expenditure of funds by an individual not listed as an officer on C-1 form. (Violation of RCW 42.17A.425)**

State law requires that, "No expenditures may be made or incurred by any candidate or political committee unless authorized by the candidate or the person or persons named on the candidate's or committee's registration form..." The above-named individuals, who were not listed as officers, were prohibited from making expenditures for the committee.

Bob Ferguson  
November 15, 2017  
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The laws regulating the reporting of campaign contributions serve a critical role in promoting transparency and ethical conduct in our elections. The Respondent's 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 Respondent 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*

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