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September 1, 2017

Via Electronic Delivery

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Re: *Citizen Action Notice Against Snohomish County Republican Central Committee*

Dear Attorney General Ferguson and County Prosecuting Attorneys Tunheim and Roe,

I write you to notify you that there is good reason to believe several violations of chapter 42.17A RCW, Washington State's campaign finance law, have been committed by the Snohomish County Republican Central Committee, a political committee (the "Respondent"), between 2015 and the present. Please note that, as provided by RCW 42.17A.765(4), in the event that you do not initiate an action against the Respondent within the applicable statutory notice periods for this Citizen Action Notice, I intend to satisfy any applicable notice requirements and proceed with an action in the name of the State. This message is being sent to each of you at the e-mail address you have provided to the Washington State Bar Association or your employer to ensure you receive notification of these allegations as required by RCW 42.17A.765(4).

This notice and the attached spreadsheet detail forty-seven apparent violations of various provisions of Washington's campaign finance law by the Respondent. The cumulative days late for all of the apparently untimely reporting included in this notice is 4,659 days as of today. The Respondent has apparently violated chapter 42.17A RCW as follows:

A. Failure to timely file and/or amend Public Disclosure Commission form C-3 and C-4 reports ("Summary, Full Report Receipts and Expenditures" and "Cash Receipts Monetary Contributions") (24 Apparent Violations)

The Respondent filed a significant volume of late reporting of its contributions and expenditures on forms C-3 and C-4 between 2015 and 2017. The attached spreadsheet identifies twenty-four apparent violations of the law requiring timely reporting of contributions and expenditures during this period. RCW 42.17A.235, .240. Notably, two reports due prior to the August 2016 primary election were not filed until after it was over.

The apparent violations break down as follows:

TOTAL DAYS LATE / REPORTS (2015)	180
TOTAL DAYS LATE / DEPOSITS (2015)	68
TOTAL DOLLAR VALUE LATE (2015)	\$240

TOTAL DAYS LATE / REPORTS (2016)	575
TOTAL DAYS LATE / DEPOSITS (2016)	14
TOTAL DOLLAR VALUE LATE (2016)	\$19,051.64

TOTAL DAYS LATE / REPORTS (2017)	21
TOTAL DOLLAR VALUE LATE (2017)	\$135

GRAND TOTAL DAYS LATE (2016-17)	858
GRAND TOTAL DOLLAR VALUES LATE (2016-17)	\$19,426.64
GRAND TOTAL NUMBER OF LATE REPORTS	24

B. Failures to timely report orders, debts, and obligations in Public Disclosure Commission form C-4 reports and Schedule B ("In Kind Contributions, Pledges, Orders, Debts, Obligations") and in-kind loan on Schedule L (23 Apparent Violations)

Respondent apparently filed no Schedule B reporting of debts, obligations, or orders from 2015 to the present. This would be appropriate if no orders, debts, or obligations exceeding \$250 in value (or over \$50 in value, and outstanding for over 30 days) were incurred in any given reporting period, but paid in full at a later time. RCW 42.17A.235, .240. It appears, however, that reportable activity occurred, and that various reports of debts, orders, and obligations remain outstanding to date.

In particular, it appears that the following expenditures correspond to unreported orders placed, debts, obligations, and an in-kind loan existing in a prior reporting period. The cumulative lateness for these outstanding Schedule B and L reports would be a total of at least 3,081 days as of today, although the delinquency period continues to accrue. The specific instances of apparent violations include the following:

1. *Washington State Fair booth 2017 (Five violations)*. Expenditures were reported of \$200 to the Evergreen State Fair (dated 12/30/16) for "Non Refundable Deposit for Fair Booth," and \$3,075 to pay the balance (dated 5/30/17). These reported expenditures show that the Respondent incurred a reportable order, obligation, or debt related to the

cost to register for the fair in December 2016, which was not paid in full until May 2017. Respondent did not report the activity on Schedule B. To the extent that Respondent ordered or reserved the booth at the fair in December 2016, the following reports were required and are currently still outstanding:

- a. *December 2016 reporting period:* Schedule B due by 1/10/17; 234 days overdue.
 - b. *January 2017 reporting period:* Schedule B due by 2/10/17; 203 days overdue.
 - c. *February 2017 reporting period:* Schedule B due by 3/10/17; 175 days overdue.
 - d. *March 2017 reporting period:* Schedule B due by 4/11/17; 144 days overdue.
 - e. *April 2017 reporting period:* Schedule B due by 5/10/17; 114 days overdue.
2. *April 21, 2017 Lincoln Day Dinner (Five violations).* Respondent held its annual Lincoln Day Dinner on April 21, 2017 at the Lynnwood Convention Center. The date, venue, and featured speaker Pete Hegseth of Fox News were apparently reserved, and were publicly advertised, as early as January 2017. See screenshot from public Facebook page dated 1/18/17 (listing venue, date, and speaker).

Expenditures were reported of \$2,500 to Premiere Speakers Bureau (dated 1/16/17) for partial payment for Mr. Hegseth's services; \$5,000 to the Lynnwood Convention Center (dated 2/24/17) for partial payment for space rental for the dinner; \$2,500 to Premiere Speakers Bureau to pay the balance of Mr. Hegseth's fee (dated 4/3/17); and \$15,761.20 to the Lynnwood Convention Center (dated 4/21/17) for the balance on the event space for the dinner. Finally, after the event, Respondent reported paying \$1,824.53 to Debra Blodgett for an expense reimbursement related to the dinner (dated 5/4/17). It appears that the dinner venue and the speaker's services were reserved by January 2017, and were reportable on Schedule B from January through March 2017 before being paid in full the next month (additionally, an in-kind loan was apparently reportable to Ms. Blodgett in April 2017 and was repaid the next month). The delinquency periods for the outstanding reporting can be summarized as follows:

- a. *January 2017 reporting period:* Schedule B due by 2/10/17; 203 days overdue.
 - b. *February 2017 reporting period:* Schedule B due by 3/10/17; 175 days overdue.
 - c. *March 2017 reporting period:* Schedule B due by 4/11/17; 144 days overdue.
 - d. *April 2017 reporting period:* Schedule B due by 5/10/17; 114 days overdue.
 - e. *May 2017 reporting period:* Schedule B due by 6/10/17; 83 days overdue.
3. *Canvassing payments following 2016 general election.* Respondent reported making expenditures for canvassing services to 33 vendors after the November 8, 2016 general election, in a total amount of \$9,900. To the extent these payments were for canvassing services performed prior to November 1, 2016, they were reportable as debts, orders, or obligations on Schedule B, but were not properly reported. In light of the large volume of payments, it appears likely that at least some of the services compensated after the election were performed prior to November 2016. To the extent the services were performed earlier, they were reportable on Schedule B and due by November 1, 2016, which report is today 304 days late and still outstanding.
4. *Washington State Fair booth 2016 (Four violations).* Expenditures were reported of \$200 to the Evergreen State Fair for "Non Refundable Deposit for Fair Booth," (dated 2/4/16),

and payment of the balance on the fair registration fee in the amount of \$2,975 (dated 6/18/16). These reported expenditures show that the Respondent incurred a reportable order, obligation, or debt related to the cost to register for the fair by February 2016, which was not paid in full until June 2016. Respondent did not report the activity on Schedule B. To the extent that Respondent ordered or reserved the booth at the fair by February 2016, the following reports were required and are currently still outstanding:

- a. *February 2016 reporting period*: Schedule B due by 3/10/16; 540 days overdue.
 - b. *March 2016 reporting period*: Schedule B due by 4/11/16; 508 days overdue.
 - c. *April 2016 reporting period*: Schedule B due by 5/10/16; 479 days overdue.
 - d. *May 2016 reporting period*: Schedule B due by 6/10/16; 448 days overdue.
5. *April 22, 2016 Lincoln Day Dinner (Four violations)*. Respondent held its annual Lincoln Day Dinner on April 22, 2016 at the Lynnwood Convention Center. Expenditures were reported of \$5,000 to the Lynnwood Convention Center (dated 1/29/16) for "Dinner Deposit for Lincoln Day Dinner," \$13,400 to the same vendor (dated 4/4/16) for the dinner; \$16,642.85 to the same vendor (dated 4/21/16) for "Balance Due Lincoln Day Dinner," \$10,000 to DJD Creative LLC (dated 4/29/16) for Dinesh D'Souza's honorarium for speaking at the dinner; and a \$1,350.86 travel reimbursement for Mr. D'Souza paid to Had Enough, LLC on April 29, 2016. Additional payments for the dinner were reported to Glen Sayes Photography (dated 5/23/16) for \$336 for photography at the dinner, and to KVI-AM (dated 5/23/16) for \$450 for radio advertising for the dinner.

Certain expenditures related to the dinner were only reported *after* the event had already concluded. As such, reportable debts, orders, and obligations were outstanding during the month of April 2016 at a minimum. Additionally, advertising as early as January 2016 showed the event was set to take place on April 22, 2016 at the Lynnwood Convention Center, and Mr. D'Souza was set to serve as the speaker. See attached Facebook posting dated January 14, 2016 (listing date, venue, and speaker). It appears that the venue and the speaker's services were reserved at that time, and were reportable on Schedule B from January through March 2016 before being paid in full the next month. The delinquency periods for the outstanding reporting can be summarized as follows:

- a. *January 2016 reporting period*: Schedule B due by 2/10/16; 569 days overdue.
 - b. *February 2016 reporting period*: Schedule B due by 3/10/16; 540 days overdue.
 - c. *March 2016 reporting period*: Schedule B due by 4/11/16; 508 days overdue.
 - d. *April 2016 reporting period*: Schedule B due by 5/10/16; 479 days overdue.
6. *February 20, 2016 Party Caucuses (Four violations)*. The Respondent held its party caucuses on February 20, 2016. No reports were filed to show any debts, obligations, or orders to reserve space for the caucuses, or to account for any caucus-related expenses. It is likely that the costs to reserve caucus space were reportable before February 2016 in that the spaces were likely reserved earlier. However, at least nine expenditures for space rental and other expenses related to the caucuses were only reported in the months after the event was over. Expenditures for the caucuses included the following:
- a. \$1,031 to Edmonds School District No. 15 (dated 2/18/16) for caucus space rental;

- b. \$490 to Billye Brooks-Sebastiani (dated 3/3/16) for "Caucus Location-Kenmore Community Club;"
- c. \$100 to Karen Hobson (dated 3/9/16) for "[r]eimbursement for 39th LD Caucus;"
- d. \$158 to Arlington School District # 16 (dated 3/9/16) for caucus expenses;
- e. \$400 to Everett Historic Theatre (dated 3/9/16) for caucus expenses;
- f. \$168 to Lake Stevens School District (dated 3/18/16) for caucus expenses;
- g. \$437 to Mukilteo School District (dated 3/22/16) for caucus expenses;
- h. \$367.65 to Bob Williams (dated 4/1/16) for caucus expenses;
- i. \$78.71 to Lakewood School District (dated 5/10/16) for caucus expenses;
- j. \$468.50 to Snohomish School District (dated 6/22/16) for caucus expenses.

The amounts paid in the months after February 2016 should have been reported as debts and obligations on Schedule B during each month until they were fully discharged in June 2016. (To the extent orders were placed to reserve caucus space and services prior to February, additional reporting on Schedule B would also be due.) Respondent did not file the required reporting, and has not filed it to date. The delinquency dates for this reporting are as follows as of today, and the daily delinquency continues to grow:

- a. *February 2016 reporting period:* Schedule B due by 3/10/16; 540 days overdue.
- b. *March 2016 reporting period:* Schedule B due by 4/11/16; 508 days overdue.
- c. *April 2016 reporting period:* Schedule B due by 5/10/16; 479 days overdue.
- d. *May 2016 reporting period:* Schedule B due by 6/10/16; 448 days overdue.

I await your position as to whether there is reasonable cause for a civil enforcement action based on these allegations, and whether you will file such an action in the name of the State.

Sincerely,



Walter M. Smith

Enclosures: Microsoft Excel spreadsheet identifying reporting violations
Facebook posts dated 1/14/16, 1/24/16, 1/18/17

cc: Linda A. Dalton, Senior Counsel, Attorney General's Office (via e-mail)
Public Disclosure Commission staff (via e-mail)

Number	Report Type	Date Filed	Amd.	Report due	Report days late	C3's: Deposit Due	(C3's: Deposit date if weekly)	(C3's: Deposit days late)	Amount reported (total contributions for C3 / expenditures for C4)
100666742	C3	11/2/2015	N	10/3/2015	30	9/8/2015	9/30/2015	22	75.00
100666738	C3	11/2/2015	N	9/7/2015	56	8/7/2015	8/31/2015	24	75.00
100666743	C3	11/2/2015	N	11/2/2015	0	10/9/2015	10/31/2015	22	75.00
100667248	C3	11/5/2015	N	8/3/2015	94				15.00

TOTAL DAYS LATE / REPORTS (2015)	180.00
TOTAL DAYS LATE / DEPOSITS (2015)	68.00
TOTAL DOLLAR VALUE LATE (2015)	240.00

Number	Report Type	Date Filed	Amd.	Report due	Report days late	C3: Deposit due	(C3's: Deposit date if weekly)	(C3's: Deposit days late)	Amount reported (total contributions for C3 / expenditures for C4)
100705905	C3	7/7/2016	N	6/13/2016	24				5.00
100705900	C3	7/7/2016	N	6/6/2016	31				109.00
100719565	C3	9/9/2016	N	8/1/2016	39				1868.22
100719566	C3	9/9/2016	N	8/1/2016	39				20.00
100719570	C3	9/9/2016	N	8/29/2016	11	8/8/2016	8/22/2016	14	380.00
100719568	C3	9/9/2016	N	8/15/2016	25				3862.00
100719567	C3	9/9/2016	N	8/8/2016	32				5.00
100727981	C3	10/18/2016	N	9/5/2016	43				1283.06
100727982	C3	10/18/2016	N	9/12/2016	36				1034.61
100727980	C3	10/18/2016	N	9/5/2016	43				391.00
100727977	C3	10/18/2016	N	9/5/2016	43				1437.00
100727984	C3	10/18/2016	N	9/19/2016	29				7500.00
100727976	C3	10/18/2016	N	9/19/2016	29				60.00
100727979	C3	10/18/2016	N	9/5/2016	43				65.00
100727985	C3	10/18/2016	N	9/19/2016	29				50.00
100727983	C3	10/18/2016	N	9/12/2016	36				477.00
100727978	C3	10/18/2016	N	9/5/2016	43				504.75

TOTAL DAYS LATE / REPORTS (2016)	575.00
TOTAL DAYS LATE / DEPOSITS (2016)	14.00
TOTAL DOLLAR VALUE LATE (2016)	19051.64

Number	Report Type	Date Filed	Amd.	Report due	Report days late	(C3's: Deposit date)	(C3's: Deposit days late)	Amount reported (total contributions for C3 / expenditures for C4)	
100775649	C3	7/17/2017	N	6/26/2017	21			135	135.00

TOTAL DAYS LATE / REPORTS (2017)	21.00
TOTAL DAYS LATE / DEPOSITS (2017)	0.00
TOTAL DOLLAR VALUE LATE (2017)	135.00
GRAND TOTAL DAYS LATE (2015-17)	776.00
GRAND TOTAL DAYS LATE / DEPOSITS (2015-17)	82.00
GRAND TOTAL DOLLAR VALUES LATE (2015-17)	19426.64
GRAND TOTAL NUMBER OF LATE REPORTS	24

2/10/2016	9/1/2017	569
3/10/2016	9/1/2017	540
4/11/2016	9/1/2017	508
5/10/2016	9/1/2017	479
6/10/2016	9/1/2017	448
11/1/2016	9/1/2017	304
1/10/2017	9/1/2017	234
2/10/2017	9/1/2017	203
3/10/2017	9/1/2017	175
4/10/2017	9/1/2017	144
5/10/2017	9/1/2017	114
6/10/2017	9/1/2017	83



Snohomish County Republican Party

January 14, 2016 · 🌐

Our **Lincoln Day** Dinner Team with a special Invitation to You!



2016 **Lincoln Day** Dinner

Snohomish County Republican Party invites you to join us for "A Night to Celebrate Freedom with Dinesh D'Souza" at the Lynnwood Convention Center on April 22...

YOUTUBE.COM

👍 Like 💬 Comment ➦ Share

Debbie Gordon Blodgett, Debbie Koepf and 2 others like this.

Chronological ▾

1 share



Debbie Koepf How fun! I will be out of the country or I would totally be there!

January 15, 2016 at 11:36pm



Snohomish County Republican Party

January 24, 2016 · 🌐

PLAN TO ATTEND YOUR PRECINCT **CAUCUS** ON FEBRUARY 20TH!

ALL THE DETAILS ARE HERE:

http://www.snocogop.com/presidential_caucus/

Snohomish County Republican Party

1. Elect delegates and alternates to the county convention or legislative district **caucus**. (The county chairman, using the two methods described in WSRP Rule 2 of WSRP Rules for Precinct **Caucus** and For Election of Delegates to State...

SNOCOGOP.COM



Snohomish County Republican Party

January 18 · 🌐

Report from Pete Hegseth of FOX News. Pete is this Year's Lincoln Day Dinner speaker on April 21st at the Lynnwood Convention Center. More about Pete on our website: <http://snocogop.com/lincoln-day-dinner>
Save the date now! Tickets and more info available soon.



👍 Like 💬 Comment ➦ Share

Jim Little, Debbie Matteson and 2 others like this.