

Respect Washington, has failed to file accurate, timely C3 and C4 reports in respect to the active litigation over City of Spokane Proposition 1. This is in clear violation of RCW 42.17A. Further, Respect Washington has failed to disclose any debt incurred by such litigation, in violation of RCW 42-17A-240(8) and WAC 390-05-295.

- **Failure to file C3 and C4 report forms in violation of RCW 42.17A.235 and 41.17A.240.**

Respect Washington entered litigation by filing a notice of appearance with the Spokane Superior Court on May 16, 2017 to defend Proposition 1, a local initiative that they sponsored. Any record of expenditures associated with the defense of Proposition 1, including attorney costs, have not been filed as of this writing. This is a clear violation of RCW 42.17A.240 (d) (8), which states that the name, address of any person and the amount owed from any debt, obligation, or any other liability must be disclosed. It also violates the requirements outlined in the C-4 form, which states that the due date for filing must be 1) filed when campaign registers if contribution were deposited or expenditures made before the registration date, 2) the 10th of each calendar month for the preceding month, 3) 21 and 7 days before election in which the campaign participates, or 4) 10th of first month after the election.

According to the Public Disclosure Commissions (PDC) website, Respect Washington has only submitted 12 expenditures. None of the expenditures list any legal activity, with the exception of legal consultation that took place on 1/18/2017. Given the stated rules listed above for a C-4 form, Respect Washington should have reported expenditures for litigation by 6/10/2017, given that the appearance occurred on 5/16/2017, yet there are no listed expenditures for that timeframe or beyond.

- **Failure to report a *pro bono* service in violation of WAC 390-17-405**

Overlapping with the issue above. Assuming that the counsel provided for the litigation defense is giving their service *pro bono*, it would still be required to be disclosed under WAC 390-17-405. Under WAC 390-17-405 (2) (a-c), which states that an attorney or accountant may donate their time to a committee but section C explicitly states that this section does not authorize services of an attorney or an accountant to be provided to a political committee with a contribution ensuing unless RCW 42.17A.005 (13) (b) (viii) and sections a-c of WAC 390-17-405 are satisfied. RCW 42.17A.005 (13) (b) (viii) states that "Legal or accounting services rendered to or on behalf of; (A) A political party or caucus political committee if the person paying for the services is the regular employer of the person rendering such services." RCW 42.17A.005 (13) (b) (viii). Further, RCW 42.17A.005 (13)(a)(1) does states that a contribution includes professional services so long as they are less than full consideration. Receiving an attorney's *pro bono* service is far less than full consideration for that service.

Respect Washington has continuously failed to report contribution either paid or otherwise to their political committee for some time now, despite the fact they are in ongoing litigation with counsel present.

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CN: 201702016211
SN: 7
PC: 3

FILED
MAY 18 2017
Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

GLOBAL NEIGHBORHOOD; REFUGEE CONNECTIONS OF SPOKANE; SPOKANE CHINESE ASSOCIATION; ASIAN PACIFIC ISLANDER COALITION - SPOKANE; SPOKANE CHINESE AMERICAN PROGRESSIVES; and the SPOKANE AREA CHAPTER OF THE NATIONAL ORGANIZATION OF WOMEN,

No. 17201621-1

NOTICE OF APPEARANCE

Plaintiffs,

v.

RESPECT WASHINGTON; VICKY DALTON, SPOKANE COUNTY AUDITOR, in her official capacity; and the CITY OF SPOKANE,

Defendants.

TO: THE CLERK OF THE SPOKANE COUNTY SUPERIOR COURT; and to ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE THAT Stephens & Klinge LLP, by and through its counsel, Richard M. Stephens, hereby appears as counsel of record for Defendant Respect Washington in the above-entitled matter. This appearance is entered without waiver of any rights, claims,

ORIGINAL

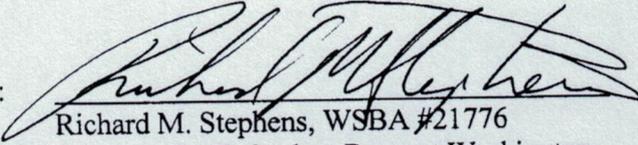
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or defenses whatsoever. All future pleadings and papers in this action, except original process, should be served on Mr. Stephens at the following address:

Stephens & Klinge LLP
10900 NE 8th Street, Suite 1325
Bellevue, WA 98004
Telephone: (425) 453-6206
Facsimile: (425) 453-6224
stephens@sklegal.pro

RESPECTFULLY submitted this 16 day of May, 2017

STEPHENS & KLINGE LLP

By: 
Richard M. Stephens, WSBA #21776
Attorney for Defendant Respect Washington

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DECLARATION OF SERVICE

I, Jill E. Stephens, declare:

I am not a party in this action. I reside in the State of Washington and am employed by Stephens & Klinge LLP in Bellevue, Washington.

On May 16, 2017, I caused a true copy of the foregoing pleading to be served on the following persons via the following means:

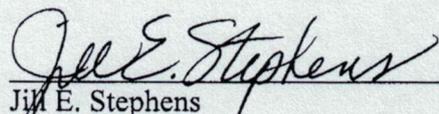
Rick Eichstaedt
Center for Justice
35 West Main, Suite 300
Spokane, WA 99201

- Hand Delivery via Legal Messenger
- First Class U.S. Mail
- Federal Express Overnight
- E-Mail:
- Other _____

- Hand Delivery via Legal Messenger
- First Class U.S. Mail
- Federal Express Overnight
- Other _____
- E-Mail:

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 16th day of May, 2017, at Bellevue, Washington.



 Jill E. Stephens
 Paralegal