1       Implementation         2       Implementation         3       Implementation         4       Implementation         5       Implementation         6       STATE OF WASHINGTON         7       STATE OF WASHINGTON,         9       Plaintiff,         10       V.         11       KITTTAS COUNTY DEMOCRATS,         a Washington registered political committee and Washington nonprofit       Oroporation,         12       Defendant.         15       I. NATURE OF ACTION         16       The State of Washington (State) brings this action to enforce the State's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendant, KITTITAS COUNTY         18       DEMOCRATS, a Washington registered political committee and Washington nonprofit corporation, violated provisions of RCW 42.17A by failing to timely report contributions received and expenditures made as required by law to be made with the State Public Disclosure         10       I. PARTIES         11       I. PARTIES         12       I. PARTIES         13       I. PARTIES         14       DEfendant.         15       I. PARTIES         16       The State of Washington registered political committee and Washington state         17       DEMOCRATS, a Washingt					
2       JBL 14 207         3       STATE OF WASHINGTON THURSTON COUNTY SUPERIOR COURT         5       STATE OF WASHINGTON, Plaintiff, v.       NO. 17-2-04103-34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         10       v.       NO. 17-2-04103-34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         11       v.       NO. 17-2-04103-34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         12       v.       NO. 17-2-04103-34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         13       Defendant.       NO. 17-2-04103-34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         14       Defendant.       Image: State St	1				
3       State of Washington County Superior Count         6       STATE OF WASHINGTON,         7       THURSTON COUNTY SUPERIOR COURT         8       STATE OF WASHINGTON,         9       Plaintiff,         10       v.         11       V.         12       COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         13       Defendant.         14       Defendant.         15       I. NATURE OF ACTION         16       The State of Washington (State) brings this action to enforce the State's campaign finance disclosure law, RCW 42.17A. The State alleges that Defendant, KITTITAS COUNTY         17       DEMOCRATS, a Washington registered political committee and Washington nonprofit corporation, violated provisions of RCW 42.17A by failing to timely report contributions received and expenditures made as required by law to be made with the State Public Disclosure Commission. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.         23       I. PARTIES         24       2.1 Plaintiff is the State of Washington. Acting through the Washington State Public Disclosure Commission, Attorney General, or a local prosecuting attorney, the State enforces the state campaign finance and disclosure laws contained in RCW 42.17A.         25       COMPLAINT FOR CIVIL PENALTIES 1       ATTORNEY GONGRINGTON COMPLAINT FOR CIVIL PENALTIES 1         26	2		So of the second contracts		
5       STATE OF WASHINGTON THURSTON COUNTY SUPERIOR COURT         8       STATE OF WASHINGTON, Plaintiff,       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         11       v.       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         11       v.       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         11       v.       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         12       v.       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES AND FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         13       v.       NO.       17 - 2 - 0 4 103 - 34 COMPLAINT FOR CIVIL PENALTIES         14       Defendant.       I       NO FOR INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A         15       I.       NATURE OF ACTION         16       The State of Washington registered political committee and Washington nonprofit corporation, violated provisions of RCW 42.17A by failing to timely report contributions received and expenditures made as required by law to be made with the State Public Disclosure Commission. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.         24       1       Plaintiff is the State of Washington. Acting through	3		• •		
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Il       COMPLAINT FOR CIVIL PENALTIES       1       ATTORNEY GENERAL OF WASHINGTON         Campaign Finance Unit       Campaign Finance Unit       PO Box 40100         VIOLATIONS OF RCW 42.17A       Olympia, WA 98504-0100	25	Public Disclosure Commission, Attorney	General, or a local prosecuting attorney, the State		
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	I	AND INJUNCTIVE RELIEF FOR	Campaign Finance Unit PO Box 40100 Olympia, WA 98504-0100		

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1 | 2.2 Defendant KITTITAS COUNTY DEMOCRATS (the Committee) is registered as a Washington nonprofit corporation. It is also registered with the state Public Disclosure Commission as a continuing bona fide political party committee. As the term is used under RCW 42.17A.005(6)(c), it is the county central committee for the Washington State Democratic Central Committee in Kittitas County, Washington.

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## III. JURISDICTION AND VENUE

3.1 This Court has subject matter jurisdiction over the present case, in accordance with RCW 42.17A. The Attorney General has authority to bring this action pursuant to RCW 42.17A.765.

10 3.2 This Court has personal jurisdiction over Defendant, a registered Washington 11 state political committee. Additionally, the acts alleged below occurred in whole or in part in 12 Thurston County, Washington.

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Venue is proper in this Court pursuant to RCW 4.12.020(1).

IV.

## **FACTUAL ALLEGATIONS**

15 4.1 RCW 42.17A declares as a matter of public policy "[t]hat political campaign 16 and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is 17 to be avoided." RCW 42.17A.001(1). Further, the statute provides that the provisions of the 18 law "shall be liberally construed to promote complete disclosure of all information respecting 19 the financing of political campaigns. . . ."

20 4.2 Washington's campaign finance law requires a campaign to timely report 21 contributions received. The information required to be disclosed includes the name and address 22 of the source of contributions that exceed \$25 in the aggregate, and the employer and 23 occupation of any individual contributor giving more than \$100 in the aggregate. RCW 42.17A.240; WAC 390-16-037. Contribution disclosures are reported on a Public 24 Disclosure Commission form "C3" which is called the "Cash Receipt Monetary Contributions" 25 26 form. Each week's contributions must be reported on the following Monday during the five

COMPLAINT FOR CIVIL PENALTIES AND INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A

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ATTORNEY GENERAL OF WASHINGTON Campaign Finance Unit PO Box 40100 Olympia, WA 98504-0100 (360) 753-6200

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months prior to a general election. RCW 42.17A.235(3).

4.3 Washington's campaign finance law also requires political committees to timely report expenditures related to state campaigns, including any debts incurred by the political committee. RCW 42.17A.235, .240(8); RCW 42.17A.005(20). The PDC form to report expenditures is called a "Summary, Full Report Receipts and Expenditures" and is a form "C-4." An expenditure is defined to include "a promise to pay, .... For the purposes of this chapter, agreements to make expenditures, contracts, and promises to pay may be reported as estimated obligations until actual payment is made." RCW 42.17A.005(20).

4.4 The Committee is a bona fide political party committee as the term is used in RCW 42.17A, and is more specifically a county central committee of the Washington State Democratic Central Committee. As such, the Committee routinely raises funds in order to support various democratic candidates and ballot propositions. Since 2012, the Committee received contributions and made expenditures, all of which were required to be reported in 14 accordance with RCW 42.17A.

4.5 The activities of the Public Disclosure Commission, including its receipt and compilation of reports required by law, are conducted in and about Thurston County.

17 4.6 In 2013, the Public Disclosure Commission received a complaint that the 18 Committee had violated state law by failing to timely file and report contributions it received 19 and expenditures it made for the year 2013.

20 4.7 In May 2016, the Committee entered into an agreement with Commission staff, acknowledging the late filings for the year 2013 and its failure to file reports electronically. 22 The Commission imposed a \$500 penalty with \$400 suspended for a period of four years based 23 on no violations during that period.

On May 8, 2017, the Attorney General's Office received a citizen action notice 24 4.8 alleging that the Committee had failed to timely file reports of contributions received and 25 26 expenditures made for the years 2015, 2016, and 2017.

COMPLAINT FOR CIVIL PENALTIES AND INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A

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## Failure to Timely Report Contributions Received

4.9 The Committee failed to timely disclose contributions it received as required by law on a C-3 report. Specifically, the Committee failed to timely file and disclose \$18,639.36 in contributions received during 2012, 2014, 2015, 2016, and 2017 on 77 separate C-3 reports. These reports ranged from one to 198 days late, representing a collective total of 5,567 days late:

7	Year	Total Deposits	Number of C-3 Reports	Days Late	Total Days Late
0	2012	\$2,043.34	13	2 - 63	337
•	2014 - 2015	\$5,916.91	37	5 - 198	4,174
0	2015 - 2017	\$10,679.11	27	1 - 107	1,056
2	TOTAL	\$18,639.36	77		5,567

Failure to Timely Report Expenditures/Deposits

4.10 In 2012, 2014, 2015, 2016, and 2017, the Committee failed to timely disclose expenditures made and in-kind contributions received as required by law on a C-4 report. Specifically, the Committee failed to timely file and disclose \$16,227.38 in expenditures made and in-kind contributions received during 2015, 2016, and 2017 on 31 separate C-4 reports. These reports ranged from one to 519 days late, representing a collective total of 4,113 days late:

17	Year	Total Expenditures	Number of C-4 Reports	Days Late	Total Days Late
18	2012	\$2,289.00	4	2 - 83	187
	2014 - 2015	\$6,939.97	15	33 - 519	2,656
19	2015 - 2017	\$7,048.41	12	1 - 231	1,270
1	TOTAL	\$16,277.38	31		4,113
20		×			

## V. CLAIMS

The State re-alleges and incorporates by reference all the factual allegations contained in the preceding paragraphs, and based on those allegations, makes the following claims:

5.1 <u>First Claim</u>: The State reasserts the factual allegations made above and further asserts that Defendant, in violation of RCW 42.17A.235(3), failed to timely disclose contributions it received to the Public Disclosure Commission.

COMPLAINT FOR CIVIL PENALTIES AND INJUNCTIVE RELIEF FOR VIOLATIONS OF RCW 42.17A 4

1	5.2	Second Claim: Plaintiff reasserts the factual allegations made above and further
2	asserts that I	Defendant, in violation of RCW 42.17A.235, failed to timely disclose expenditures
3	it made and i	n-kind contributions it received to the Public Disclosure Commission.
4		VI. REQUEST FOR RELIEF
5	WHE	REFORE, the State requests the following relief as provided by law:
6	6.1	For such remedies as the court may deem appropriate under RCW 42.17A.750,
7	including bu	t not limited to imposition of a civil penalty, all to be determined at trial;
8	6.2	For all costs of investigation and trial, including reasonable attorneys' fees, as
9	authorized by	y RCW 42.17A.765(5);
10	6.3	For temporary and permanent injunctive relief, as authorized by
11	RCW 42.17A	A.750(1)(h); and
12	6.4	For such other legal and equitable relief as this Court deems appropriate.
13	DAT	ED this 14th day of July, 2017.
14 15		OFFICE OF THE ATTORNEY GENERAL State of Washington
15		Spinda ADAITA
17		7007000000000000000000000000000000000
18		Senior Assistant Attorney General Attorneys for Plaintiff State of Washington
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	AND INJUNC	FOR CIVIL PENALTIES5ATTORNEY GENERAL OF WASHINGTON Campaign Finance Unit PO Box 40100OF RCW 42.17AOlympia, WA 98504-0100

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