



1 is registered as a political committee with the state Public Disclosure Commission. Its most  
2 recent committee registration form was filed on September 21, 2015. It identifies Martin  
3 Chaney as a committee officer and Roger Crew as its treasurer.

4 **III. JURISDICTION AND VENUE**

5 3.1 This Court has subject matter jurisdiction over the present case, in accordance  
6 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to  
7 RCW 42.17A.765.

8 3.2 This Court has personal jurisdiction over the Committee, a registered political  
9 committee in the State of Washington. The Committee's headquarters are located in Carnation,  
10 King County, Washington. It was required to timely file and complete reports of contributions  
11 received and expenditures made with the state Public Disclosure Commission, which is located  
12 in Thurston County, Washington. Additionally, the acts and omissions complained of here took  
13 place in Thurston County.

14 3.3 Venue is proper in this Court pursuant to RCW 4.12.020(1).

15 **IV. FACTUAL ALLEGATIONS**

16 4.1 RCW 42.17A declares as a matter of public policy "[t]hat political campaign  
17 and lobbying contributions and expenditures be fully disclosed to the public and that secrecy is  
18 to be avoided." RCW 42.17A.001(1). The statute further provides that the state's campaign  
19 finance and disclosure law "shall be liberally construed to promote complete disclosure of all  
20 information respecting the financing of political campaigns."

21 4.2 Washington's campaign finance law requires political committees to timely  
22 report contributions received, including in-kind contributions. The information required to be  
23 disclosed includes the name and address of the source of contributions that exceed \$25 in the  
24 aggregate, and the employer and occupation of any individual contributor giving more than  
25 \$100 in the aggregate. RCW 42.17A.235, .240; WAC 390-16-037. Contribution disclosures are  
26 reported on a Public Disclosure Commission form "C-3" which is called the "Cash Receipt

1 Monetary Contributions” form.

2 4.3 Washington’s campaign finance law also requires political committees to timely  
3 report expenditures related to state campaigns, including any debts incurred by the political  
4 committee. RCW 42.17A.235, .240(8); RCW 42.17A.005(20). The PDC form to report  
5 expenditures is called a “Summary, Full Report Receipts and Expenditures” and is a form  
6 “C-4.” An expenditure is defined to include “a *promise to pay*, . . . . For the purposes of this  
7 chapter, agreements to make expenditures, contracts, and promises to pay may be reported as  
8 estimated obligations until actual payment is made.” RCW 42.17A.005(20).

9 4.4 The Committee routinely raises funds in order to support various Democratic  
10 candidates. During 2016, the Committee received contributions and made expenditures, all of  
11 which should have been reported in accordance with RCW 42.17A.

12 Failure to Timely Report Contributions Received

13 4.5 The Committee failed to timely disclose contributions it received as required by  
14 law on a form C-3 report. Specifically, the Committee failed to timely disclose \$3,455 in  
15 contributions received which it should have disclosed no later than September 12, 2016. It did  
16 not disclose receipt of these contributions until October 17, 2016, 35 days late.

17 4.6 Next, the Committee failed to timely disclose \$1,780 in contributions received  
18 which it should have disclosed no later than September 19, 2016. It did not disclose receipt of  
19 these contributions until October 17, 2016, 28 days late.

20 4.7 Finally, the Committee failed to timely disclose \$2,425 in contributions  
21 received which it should have disclosed no later than September 19, 2016. It did not disclose  
22 receipt of these contributions until October 17, 2016, 28 days late.

23 4.8 In total, the Committee failed to timely disclose \$7,660 in contributions on three  
24 C-3 contribution reports a total of 91 days late.

25 Failure to Timely Report Expenditures

26 4.9 In 2016, the Committee failed to timely disclose its expenditures as required by

1 law on a C-4 report. The delinquencies are identified as follows:

2 a. January 2016 Report: On September 6, 2016, the Committee first filed its C-4  
3 report for the January 1 through January 31, 2016 reporting period. The C-4 report disclosed  
4 expenditures totaling \$8,010, which should have been reported no later than  
5 February 10, 2016. These disclosures were reported 209 days late.

6 b. July-August 2016 Report: On November 3, 2016, the Committee first filed its  
7 C-4 report for the July 26 through August 31, 2016 reporting period. The C-4 report disclosed  
8 expenditures totaling \$500, which should have been reported no later than September 12, 2016.  
9 These disclosures were reported 52 days late.

10 c. November 2016 Report: On March 13, 2017, the Committee first filed its C-4  
11 report for the November 1 through November 30, 2016 reporting period. The C-4 report  
12 disclosed expenditures totaling \$58.85, which should have been reported December 12, 2016.  
13 These disclosures were reported 91 days late.

14 4.10 In total, the Committee filed three C-4 reports a total of 352 days late.

## 15 V. CLAIMS

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

18 5.1 First Claim: Plaintiff reasserts the factual allegations made above and further  
19 asserts that Defendant, in violation of RCW 42.17A.235, failed to timely disclose contributions  
20 it received to the Public Disclosure Commission.

21 5.2 Second Claim: Plaintiff reasserts the factual allegations made above and further  
22 asserts that Defendant, in violation of RCW 42.17A.235, failed to timely disclose expenditures  
23 it made to the Public Disclosure Commission.

## 24 VI. REQUEST FOR RELIEF

25 WHEREFORE, Plaintiff requests the following relief as provided by law:

26 6.1 For such remedies as the court may deem appropriate under RCW 42.17A.750,

1 including but not limited to imposition of a civil penalty, all to be determined at trial;


2 6.2 For all costs of investigation and trial, including reasonable attorneys' fees, as  
3 authorized by RCW 42.17A.765(5);

4 6.3 For temporary and permanent injunctive relief, as authorized by  
5 RCW 42.17A.750(1)(h); and

6 6.4 For such other legal and equitable relief as this Court deems appropriate.

7 DATED this 19 day of June, 2017.

8 STATE OF WASHINGTON  
9 OFFICE OF THE ATTORNEY GENERAL

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