

Complaint Description

File a Formal Complaint - Chet Dow

[Cdown1](#) (Thu, 28 Jun at 3:06 PM)

It appears that Dean Berkeley, current declared candidate for State Representative in the 42nd Legislative District, position #1, has committed very significant violations of **RCW 42.17A**. Those violations are detailed as follows:

Failed to File C-1 candidate registration form. While his name will appear on the ballot for the primary in August, he didn't bother to file a C-1 form providing any information about him or his campaign as required by law. This form was due many months ago.

Failed to file F-1 personal financial disclosure form. This is required for all candidates, and Berkeley appears to have ignored the state's campaign finance laws in this case as well. This form is also months late.

Failed to file any C-3 or C-4 campaign expenditure or contribution reports since he filed for office months ago. At a minimum he would need to report his filing fee, which is clearly a campaign-related expense. This was reaffirmed in a Washington State Attorney General Opinion written By Slade Gorton, when he wrote, in part: "In simplest terms, this payment (in those cases in which it is required) is a necessary part of the candidate's financial outlay if he is to have his name appear on the ballot and, in that manner, become eligible to be elected to the office he is seeking. Moreover, the payment is very clearly a transfer of something of value and it cannot be doubted that it is for the purpose of assisting the candidate and furthering his election campaign. Payment of the filing fee is thus precisely within the broad definition of "expenditure" as set forth above..." -- **AGO 1974 No.**

16 - July 29, 1974

There are likely other expenditures and contributions that should be reported by this political candidate, but since no information has been provided to the PDC by this candidate, there is no transparency on what is happening with this secretive, stealth campaign.

Please investigate the Berkeley campaign for their total disregard for Washington State's campaign finance laws.

Sincerely,

Chet Dow

Chester L Dow
June 28, 2018

What impact does the alleged violation(s) have on the public?
<p>Attention PDC Staff -</p> <p>The public has a right to know who is running for office. Because this candidate has not filed a C1 form, an F1 form, or any C3 or C4 forms, the public knows nothing other than the address and name of this candidate. There is zero transparency to the public for what is happening with this campaign.</p>
List of attached evidence or contact information where evidence may be found.
<p>This candidate is listed in the PDC database with zero additional documents to support what is happening with this campaign. Sometimes the absence of information is evidence enough of a violation.</p>
List of potential witnesses with contact information to reach them.
<p>The candidate himself – Dean Berkeley – should be contacted</p> <p>His treasurer (assuming he has one – we don't know) should be contacted</p>
Complaint Certification:
<p>I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.</p>