## Schwerin Campbell Barnard Iglitzin & Lavitt LLP

ATTORNEYS AT LAW

Of Counsel Lawrence Schwerin

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Sent via email to judyg@atg.wa.gov

November 17, 2017

RECEIVED 11/17/2017 ATTORNEY GENERAL'S OFFICE Campaign Finance Unit

Bob Ferguson Attorney General Washington State Attorney General's Office 1125 Washington Street SE PO Box 40100 Olympia, WA 98504-0100

RE: Notice of Violations of RCW 42.17A (Andrew Stokesbary)

SCBIL File No. 6552-021

Dear Mr. Ferguson:

On behalf of the Washington State Democratic Party, we write to notify you that there is good reason to believe several violations of the Fair Campaign Practices Act, RCW 42.17A et seq., have been committed by State Representative Andrew Stokesbary and Representative Stokesbary's authorized political committee (the 'Respondents'). Please consider this our 45-day notice pursuant to RCW 42.17A.765(4).

This notice details several violations of Washington's campaign finance law committed by Respondents, as set forth below. Specifically, it appears that the Respondents have repeatedly failed to adhere to the filing requirements set forth in RCW 42.17A.220 by habitually submitting erroneous C-3 reports. The following reports, all filed within the relevant limitations period, are improperly predated. That is, each report purports to be filed *before* the deposit to which it relates was even made.

- ξ 100722390
- ξ 100730614
- ξ 100724001
- ξ 100736484
- ξ 100737211
- ξ 100697358
- ξ 100702132
- ξ 100702339
- ξ 100712336

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ξ 100719708

ξ 100721432

ξ 100722389

By improperly predating the above reports the Respondents effectively circumvent campaign finance filing requirements and cast serious doubt as to the accuracy and integrity of the contents of these and other reports.

The laws regulating the reporting of campaign contributions serve a critical role in promoting transparency and ethical conduct in our elections. Respondents 'disregard for these laws show an unacceptable lack of commitment to the principles our campaign finance laws uphold.

Please be aware that if you do not initiate an action against Respondents within the applicable statutory notice periods, we intend to satisfy any applicable notice requirements and proceed with an action in the name of the State. Please do not hesitate to contact us if you have any questions.

Sincerely,

Dmitri Iglitzin

Counsel for Washington State Democrats

## Enclosures

cc: Linda Dalton, Assistant Attorney General

Thurston County Prosecutor King County Prosecutor Pierce County Prosecutor