

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 (Jan Angel)
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 Senator Jan Angel and Senator Angel'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.

Respondents filed an untimely C-4 report required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit A.


Further, Respondents filed several untimely C-3 reports required by law to be filed with the Public Disclosure Commission, RCW 42.17A.235 and .240, as set forth in Exhibit B.

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

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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
Kitsap County Prosecutor
Pierce County Prosecutor

Exhibit A Angel – Late C4s

1. February 10, 2014, form C-4 report(s) 100566175

This report, for December 2013, was apparently due by January 10, 2013.

	A	B	C	D	E	F	G
1	Exhibit B -- Illegally Late Reported C3s						
2							
3	Violation #	Report #	Deposit Date	Report Due Date	Date Reported	Dates Late (approx.)	Amount of Deposit
4	1	100720711	8/3/2016	9/10/2016	9/12/2016	2	\$1,000.00
5	2	100720690	8/22/2016	9/10/2016	9/12/2016	2	\$500.00
6	3	100720690	8/22/2016	9/10/2016	9/12/2016	2	\$500.00
7	4	100737629	11/12/2016	12/10/2016	12/12/2016	2	\$1,500.00
8	5	100737630	11/23/2016	12/10/2016	12/12/2016	2	\$1,500.00
9	Total					10	\$5,000.00