



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3106

DATE FILMED 10/12/91 CAMERA NO. 2

CAMERAMAN AS

91040864905

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 April 1990

ANALYST: Donald L. Averett

I. COMMITTEE: Washington State Democratic Central  
Committee (C00114439)  
Clay Bleck, Treasurer  
1701 Smith Tower  
Seattle, WA 98104

II. RELEVANT STATUTE: 2 U.S.C. §441b  
11 CFR §102.5(a)(2)

III. BACKGROUND:

Receipt of Apparent Impermissible Contributions from  
Corporations, Labor Organizations and Unregistered  
Organizations

A. Possible Violations Discovered During Normal Review

The Washington State Democratic Central Committee ("the Committee") disclosed receipts totalling \$7,775 from seven (7) corporations and labor organizations (Chart 1 and Attachments) and \$14,667.87 from thirty-three (33) unregistered organizations (Chart 2 and Attachments) during the period January 1, 1988 through December 31, 1988.

A Request for Additional Information ("RFAI") was sent to the Committee on March 29, 1989, for the 1988 Year End Report referencing the receipt of contributions from unregistered organizations and a labor organization. The RFAI requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer-out any impermissible funds (Attachment 2).

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CENTRAL COMMITTEE  
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On April 10, 1989, the Commission received a response which indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account because of a bookkeeping error. The response included a copy of a check dated April 7, 1989 transferring the full amount to its non-federal account. The response also included copies of letters to each of the contributing organizations. The letters advised the organizations that the contributions had been mistakenly deposited in the Committee's Federal account and that they were now being transferred to the State and Local account (Attachment 3).

On June 21, 1989 the Commission received amendments for all 1988 reports except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions, which had not previously been disclosed (Attachment 4). The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, RFAIs were sent to the Committee for all amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports requesting additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer-out any impermissible funds (Attachment 5).

On August 22, 1989, the Commission received a response which indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks dated June 19, June 23, June 30 and July 20, 1989 transferring the amounts to its non-federal account.<sup>1/</sup> The response also included copies of letters to each of the contributing organizations. The letters advised the organizations that the contributions had been mistakenly deposited in the Committee's federal account and that they were now being transferred to the State and Local account (Attachment 6).

Upon further review of information provided by the Committee, additional apparent impermissible receipts were discovered. On December 20, 1989, an RFAI was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports referencing the receipt of contributions from unregistered organizations and a labor organization. The RFAI requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer-out any impermissible funds (Attachment 7).

<sup>1/</sup> It is not clear from the response which impermissible contributions composed each of the transfers-out.

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On January 17, 1990 the Commission received a response which indicated that a portion of the apparent impermissible contributions had been mistakenly deposited in the federal account. The response indicated that the remainder of the apparent impermissible contributions were received from local party organizations and that the Committee believed them to be permissible contributions but transferred them out "[s]o that there will be no question...". The response included a copy of a check dated January 9, 1990 transferring the full amount to its non-federal account (Attachment 8).

The 1989 Mid-Year and Year End Reports disclosed the transfers-out on Schedule B supporting Line 20 (Attachment 9) which were made in April, June, July and August for the apparent impermissible contributions.

B. Possible Violations Discovered During Referral Preparation

Review of the Committee's amended 30 Day Post-General Report disclosed the receipt of an additional \$150 apparent impermissible contribution from an unregistered organization. The Committee has not been notified of this apparent impermissible contribution nor has the Committee refunded it or transferred it out.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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APPARENT IMPERMISSIBLE CONTRIBUTIONS FROM  
CORPORATIONS AND LABOR ORGANIZATIONS

CONTRIBUTOR	AMOUNT	DATE RECEIVED	DATE TRANSFERRED	ATTACHMENTS
International Longshoreman's Local 19	\$2,000	11/07/88	04/07/89	N,3
Washington State Employees Local 504	25	06/13/88	*	C,6
Edmonds Education Assoc.	2,000	10/13/88	*	G,6
The Boeing Company	2,500	10/31/88	*	K,6
Ron Dotzauer and Associates, Inc.	125	12/12/88	*	Q,6
United Transportation Union	125	12/22/88	08/15/89	Q,6
Aerospace Machinists #751	1,000	10/03/88	01/09/90	J,8

\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/23/89, 06/30/89 or 07/20/89.

APPARENT IMPERMISSIBLE CONTRIBUTIONS FROM  
UNREGISTERED ORGANIZATIONS

CONTRIBUTOR	AMOUNT	DATE RECEIVED	DATE TRANSFERRED	ATTACHMENTS
Project 500*	\$5,000.00	11/07/88	04/07/89	M,3
Washington Education Association/PULSE	750.00	12/02/88	04/07/89	O,3
Washington State Labor Council-PPP Committee	250.00 500.00	12/02/88 10/13/88	04/07/89 **	O,3 G,6
Public Employees Action Committee	200.00	12/12/88	04/07/89	O,3
People for Ken Jacobsen	50.00	02/04/88	**	B,6
Robert Basich Campaign	25.00	01/07/88	**	B,6
The Royer Committee	25.00 125.00	03/29/88 12/02/88	** **	B,6 Q,6
Democratic Majority Committee	489.88	03/23/88	**	B,6
June Leonard Campaign	50.00	05/26/88	**	C,6
Committee for Ernest Crane	100.00	05/26/88	**	C,6
Committee to Elect Wayne Ehlers	100.00	05/26/88	**	C,6
Frank Warnke Campaign Fund	50.00	06/09/88	**	C,6
Citizens to Elect George D. Hasten	65.00	06/09/88	**	C,6
Committee for Dolores Sibonga	50.00	08/12/88	**	D,6
Marlin Applewick Election Committee	500.00	10/03/88	**	F,6
People for Joe King	500.00	10/03/88	**	F,6

\*A Registration Notice and Second Letter were sent to Project 500 on March 16 and April 6, 1989. A response was received May 3, 1989 which stated that the contribution was intended to be used for state election activity.

\*\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/23/89, 06/30/89 or 07/20/89.

APPARENT IMPERMISSIBLE CONTRIBUTIONS FROM  
UNREGISTERED ORGANIZATIONS

CONTRIBUTOR	AMOUNT	DATE RECEIVED	DATE TRANSFERRED	ATTACHMENTS
Committee to Elect Marc Gaspard	\$ 500.00	10/13/88	**	G,6
Committee to Elect Art Wang	750.00	10/13/88	**	G,6
	250.00	10/13/88	**	H,6
LAWPAC	250.00	10/13/88	**	G,6
Committee for Brian Ebersole	250.00	10/13/88	**	G,6
Northshore Education Assoc. (NSEA-PAC)	500.00	10/13/88	**	H,6
Bev Goodman Committee	387.99	10/13/88	**	H,6
Dejarnett Senate Campaign	50.00	10/21/88	**	K,6
Max Vekich Campaign Fund	100.00	11/04/88	**	K,6
Committee to Re-Elect Dennis Dellvo	100.00	11/06/88	**	K,6
Re-Election Committee for Paul Conner	125.00	12/12/88	**	Q,6
Committee to Elect Cal Anderson	125.00	12/12/88	**	Q,6
Kitsap County Democrats	100.00	02/15/88	01/09/90***	A,8
41st District Democrats	50.00	03/01/88	01/09/90***	A,8
CWA District 7 PEC	550.00	10/03/88	01/09/90	E,8
4th District Democrats	1,100.00	10/13/88	01/09/90***	I,8
Mason County Democrats	500.00	11/02/88	01/09/90***	P,8
46 Electrical Workers PAC	150.00	11/07/88		L

\*\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/30/89, 06/30/89 or 07/20/89.

\*\*\*The Committee stated that it believed that it would be possible to demonstrate that these contributions were permissible but that it was transferring them out "[s]o that there will be no question...".

## 1988 APRIL QUARTERLY REPORT

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

 PAGE 1  
 FOR LINE NUMBER 11(b)

Any information carried from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (in Full)

Washington State Democratic Central Committee

 A. Full Name, Mailing Address and ZIP Code  
 Kitsap County Democrats  
 P.O. Box 27  
 Silverdale, WA 98383

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

2/15/88

\$ 100.00

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

\$ 100.00

 B. Full Name, Mailing Address and ZIP Code  
 41st District Democrats  
 3230 73rd S.E.  
 Mercer Island, WA 98040

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

3/1/88

50.00

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

\$ 50.00

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

 Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Aggregate Year-to-Date &gt; \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

98035271473

**SCHEDULE A**

Any information obtained from this report will be used for the purpose of identifying and locating any person who is a contributor to the campaign of a candidate for federal office, or who is a contributor to the campaign of a candidate for state or local office, or who is a contributor to the campaign of a candidate for the office of President or Vice President of the United States.

Name of Committee: **Washington State Democratic Central Committee**

<p>A. Full Name, Mailing Address and ZIP Code  <b>ROBERT BRUCE CORNWELL</b>  <b>510 SUMNER</b>  <b>ABERDEEN, WA 98501</b> *</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$ 25.00</b></p>	<p>Date (month, day, year)  <b>11/7/88</b></p>	<p>Amount of Cash Received this Period  <b>25.00</b></p>
<p>B. Full Name, Mailing Address and ZIP Code  <b>PEOPLE FOR RON JACOBSON</b>  <b>2611 NE 125th</b>  <b>SEATTLE, WA 98125</b> *</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$ 50.00</b></p>	<p>Date (month, day, year)  <b>2/4/88</b></p>	<p>Amount of Cash Received this Period  <b>50.00</b></p>
<p>C. Full Name, Mailing Address and ZIP Code  <b>DEMOCRATIC MAJORITY</b>  <b>COMMITTEE</b>  <b>10317 3rd NW</b>  <b>SEATTLE, WA 98177</b> *</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$ 489.88</b></p>	<p>Date (month, day, year)  <b>3/23/88</b></p>	<p>Amount of Cash Received this Period  <b>489.88</b></p>
<p>D. Full Name, Mailing Address and ZIP Code  <b>THE REYNOLDS COMMITTEE</b>  <b>PO BOX 12759</b>  <b>SEATTLE, WA 98111</b> *</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$ 25.00</b></p>	<p>Date (month, day, year)  <b>2/29/88</b></p>	<p>Amount of Cash Received this Period  <b>25.00</b></p>
<p>E. Full Name, Mailing Address and ZIP Code          Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$</b></p>	<p>Date (month, day, year)  </p>	<p>Amount of Cash Received this Period  </p>
<p>F. Full Name, Mailing Address and ZIP Code          Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$</b></p>	<p>Date (month, day, year)  </p>	<p>Amount of Cash Received this Period  </p>
<p>G. Full Name, Mailing Address and ZIP Code  <b>* MEND</b>  <b>THESE CASHES DEPOSITED IN</b>  <b>ERRA IN FEDERAL ACCOUNT.</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General</p>	<p>Name of Employer      Occupation    Aggregate Year-to-Date <b>\$</b></p>	<p>Date (month, day, year)  </p>	<p>Amount of Cash Received this Period  </p>

97035981020



FORM 1A

Information on this form is to be furnished to the Washington State Democratic Central Committee by the donor of the contribution. If the donor is a corporation, partnership, or other entity, the name of the entity and the name of the person who made the contribution must be given.

Name of Contributor: **Washington State Democratic Central Committee** **AMENDED 1988 JULY QUARTERLY REPORT (received 6/21/89)**

<p>A. Full Name, Mailing Address and ZIP Code  <b>JUNE LEONARD EARNED</b>  <b>12404 GARDEN HW. S.</b>  <b>SEATTLE, WA 98148</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>5/26/88</b></p>	<p>Amount of Each Receipt this Period  <b>50.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>B. Full Name, Mailing Address and ZIP Code  <b>COMMITTEE FOR ERNEST</b>  <b>220 15 ST. NE</b>  <b>MBURN, WA 98002</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>5/26/88</b></p>	<p>Amount of Each Receipt this Period  <b>100.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>C. Full Name, Mailing Address and ZIP Code  <b>COMMITTEE TO ELECT</b>  <b>WAYNE GILLES</b>  <b>PO BOX 857</b>  <b>SANITARY, WA 98387</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>5/26/88</b></p>	<p>Amount of Each Receipt this Period  <b>100.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>D. Full Name, Mailing Address and ZIP Code  <b>FRANK WARNE GARDNER</b>  <b>FUND</b>  <b>32021 116 PL. S. C-3</b>  <b>FEDERAL WAY, WA 98003</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>6/19/88</b></p>	<p>Amount of Each Receipt this Period  <b>50.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>E. Full Name, Mailing Address and ZIP Code  <b>CITIZENS TO ELECT GEORGE</b>  <b>D. MASTER</b>  <b>3425 CHAMBERLAIN DR. SW</b>  <b>TUMWATER, WA 98502</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>6/19/88</b></p>	<p>Amount of Each Receipt this Period  <b>65.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>F. Full Name, Mailing Address and ZIP Code  <b>WASHINGTON STATE EMPLOYEES</b>  <b>LOCAL 504</b>  <b>RT. 2 BOX 127A</b>  <b>MEAD, WA 99021</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)  <b>6/13/88</b></p>	<p>Amount of Each Receipt this Period  <b>25.00</b></p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			
<p>G. Full Name, Mailing Address and ZIP Code  <b>* MEAD THESE CHECKS</b>  <b>DEPOSITED IN ERROR IN</b>  <b>FEDERAL ACCOUNT</b></p>	<p>Name of Employer          _____          Occupation          _____</p>	<p>Date (month, day, year)          _____</p>	<p>Amount of Each Receipt this Period          _____</p>
<p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify): _____</p>			

SUBTOTAL of Receipts This Page (optional) \_\_\_\_\_

TOTAL This Period (fill page this line number only) **390.00**

343340864914

**SCHEDULE A**

Any information obtained from this report and the accompanying schedule shall be used for the purpose of the report only and shall not be used for any other purpose.

NAME OF REPORTER: **Washington State Democratic Central Committee**

<p><b>A. Full Name, Mailing Address and ZIP Code</b>  <b>COMMITTEE FOR DOLORES</b>  <b>5180000</b>  <b>PO BOX 8274</b>  <b>SEATTLE, WA 98114</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)                  6/1/89</p>	<p>Amount of Each Receipt this Period                  50.00</p>
<p><b>B. Full Name, Mailing Address and ZIP Code</b>  <b>R MEMO THIS CHECK</b>  <b>DEPOSITED IN OTHER IN</b>  <b>FEDERAL ACCOUNT</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>C. Full Name, Mailing Address and ZIP Code</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>D. Full Name, Mailing Address and ZIP Code</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>E. Full Name, Mailing Address and ZIP Code</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>F. Full Name, Mailing Address and ZIP Code</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>G. Full Name, Mailing Address and ZIP Code</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer                  Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p><b>SUBTOTAL of Receipts This Page (optional)</b></p>			
<p><b>TOTAL This Period (last page this line number only)</b></p>			<p>50.00</p>

3 9 1 4 3 4 8 16 04 29 21 5

## SCHEDULE A

1988 12 DAY PRE-GENERAL REPORT

(6)

Any information reported here must be true and correct. If it is not, the filer may be subject to penalties under the Internal Revenue Code.

NAME OF CONTRIBUTOR (Print)

Washington State Democratic Central Council

A. Full Name, Mailing Address and ZIP Code  
 CWA Dist 7 - PAC  
 6025 R. Preston  
 Englewood, CO 80111

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

12/17/88

Amount of Each Receipt this Period

\$50.00

B. Full Name, Mailing Address and ZIP Code  
 United Steelworkers of America  
 PAC - Pittsburgh, PA

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

12/17/88

Amount of Each Receipt this Period

\$5,000.00

C. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

Amount of Each Receipt this Period

D. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

Amount of Each Receipt this Period

E. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

Amount of Each Receipt this Period

F. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

Amount of Each Receipt this Period

G. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

Name of Employer

Occupation

Aggregate Year-to-Date

Date (month, day, year)

Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (ignore)

TOTAL This Period (last page and line number only)

5,550.00

3 1 3 3 4 3 0 8 6 4 2 3 1 6



**MODULE A**

The information entered here will be used to determine if the donor is a resident of the state, and if so, whether the donor is a resident of the state for purposes of the election laws.

Name of Committee in Full

Washington State Democratic Central Committee

AMENDED 1988 12 DAY PRE-GENERAL REPORT  
(received 6/21/89)

<p>A. Full Name, Mailing Address and ZIP Code  <b>ARLEN ARNOLD RAYMOND</b>  <b>COMMITTEE</b>  <b>PO BOX 25764</b>  <b>SEATTLE, WA 98125*</b></p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>SEATTLE</b></p> <p>Occupation  <b>SEATTLE</b></p>	<p>Date (month, day, year)  <b>10/3/88</b></p>	<p>Amount of Each Receipt this Period  <b>500.00</b></p>
<p>B. Full Name, Mailing Address and ZIP Code  <b>PEYER FOR JOE KIM</b>  <b>703 BROADWAY SUITE 200</b>  <b>VAN COUVER, WA 98660*</b></p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>SEATTLE</b></p> <p>Occupation  <b>SEATTLE</b></p>	<p>Date (month, day, year)  <b>10/3/88</b></p>	<p>Amount of Each Receipt this Period  <b>500.00</b></p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code  <b>* MEMO - THESE CHECKS</b>  <b>DEPOSITED IN ERROR IN</b>  <b>FEDERAL ACCOUNT</b></p> <p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>SUBTOTAL of Receipts This Page (optional) .....</p>			<p><b>1000.00</b></p>
<p>TOTAL This Period (last page this line number only) .....</p>			<p></p>

9310498849437

AMENDED 6/20/89  
ITEMIZED RECEIPTS

## 12-DAY PRE-GENERAL REPORT

Use separate sheet for each receipt of the attached Summary Page

All receipts on such Reports and Statements may not be used by any person for the purpose of collecting contributions from any person other than using the name and address of any political committee to collect contributions from such committee

COMMITTEE (in Full)

AMENDED 1988 12 DAY PRE-GENERAL REPORT (received 6/21/89)

<p>A Full Name, Mailing Address and ZIP Code EDMONDS EDUCATION ASSOCIATION 19707 64TH W, SUITE 204 EDMONDS, WA 98026 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 2000.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 2000.00</p>
<p>B Full Name, Mailing Address and ZIP Code COMMITTEE TO ELECT MARC L. SPANARD 295 11111 VALLEY, WA 98371 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 500.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 500.00</p>
<p>C Full Name, Mailing Address and ZIP Code WASHINGTON STATE LABOR COUNCIL 1111 8th Ave. W. SEATTLE, WA 98119 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 500.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 500.00</p>
<p>D Full Name, Mailing Address and ZIP Code COMMITTEE TO ELECT ART WANK A 5841 TALOMA, WA 98405 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 250.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 250.00</p>
<p>E Full Name, Mailing Address and ZIP Code CHURCH 25 S. WASHINGTON SEATTLE, WA 98104 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 250.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 250.00</p>
<p>F Full Name, Mailing Address and ZIP Code COMMITTEE FOR BRIAN ECKSOLE 1642-B SEVENTH AVENUE OLYMPIA, WA 98504 *</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$ 250.00</p>	<p>Date (month, day, year) 10/13/88</p>	<p>Amount of Receipt 250.00</p>
<p>G Full Name, Mailing Address and ZIP Code MARC THE CHAIRS CA THIS PARK RETIREMENT A SOCIETY MARC WAS PUT IN THE MUSEUM THAT'S FULL EXPLANATION TO LETTER</p> <p>Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)</p>	<p>Name of Employer Occupation Aggregate Year-to-Date &gt; \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Receipt</p>

TOTAL of Receipts This Page (optional)

4250.00

This page of last page this line number only

91040864918



## SCHEDULE A

Any information supplied from your records and documents should be supported by the original or a copy of the original document.

NAME OF CONTRIBUTOR (in full)

AMENDED 1988 12 DAY PRE-GENERAL REPORT (received 6/21/89)

## A. Full Name, Mailing Address and ZIP Code

AMERICAN EDUCATION  
704 NE 18th St  
BOTHELL, WA 98021 \*

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

300.00

## B. Full Name, Mailing Address and ZIP Code

COMMITTEE TO GET AIT  
PO BOX 5881  
TACOMA, WA 98405 \*

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

250.00

## C. Full Name, Mailing Address and ZIP Code

THE GW GOODMAN COMMITTEE  
BOX 1057  
YAKIMA, WA 98907 \*

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

387.99

## D. Full Name, Mailing Address and ZIP Code

\* MEMO THE CHECKS ON  
THIS PAGE REPRESENT A  
DEPOSIT WHICH WAS PUT  
ON THE ABOVE DEPOSIT

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

## E. Full Name, Mailing Address and ZIP Code

SLIP - FULL EXPLANATION  
IN LETTER

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

## F. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

## G. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General  
☐ Other (specify):

## Name of Employer

## Occupation

## Date (month, day, year)

## Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

1137.99

TOTAL The Period (last page this line number only)

6387.99

39 1073450988 1 0 0 7 9

## ITEMIZED RECEIPTS

AMENDED 1988 12 DAY PRE-GENERAL REPORT (received 8/21/89)

Use separate schedule for each category of the Detailed Summary Page

Completion of such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions to or from the using the name and address of any political committee to solicit contributions from such committee

Of Committee in Part

Washington State Democratic Central Committee

A For Name, Mailing Address and ZIP Code 111 DISTRICT DETROIT 19205 4TH AVE. DETROIT, MI 48201	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period 1100.00
B For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G For Name, Mailing Address and ZIP Code  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employee:  Occupation:  Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

S. R. T. C. A. L. H. E. A. R. I. N. G. S.

TOTAL: This Page of last page this line number on:

1100.00

91040864920

**JLE A**  
**ITEMIZED RECEIPTS**  
 AMENDED 1988 12 DAY PRE-GENERAL REPORT (received 8/21/89)

See separate schedule for each category of the Detailed Summary Page

PAGE 1  
 11/11  
 FOR LINE NUMBER 11(1)

Information reported from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or to communicate, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Washington State Democratic Central Committee

<b>A. Full Name, Mailing Address and ZIP Code</b> JWA DIST 7- PEC 8085 E Prairie Englewood, CO 80111 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$ 550.00	<b>Date (month, day, year)</b> 10/3/88	<b>Amount of Each Receipt this Period</b> 550.00
<b>B. Full Name, Mailing Address and ZIP Code</b> United Steelworkers of America PAC - Pittsburgh, PA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$ 5,000.00	<b>Date (month, day, year)</b> 10/17/88	<b>Amount of Each Receipt this Period</b> 5,000.00
<b>C. Full Name, Mailing Address and ZIP Code</b> Aerospace Machinists #251 5505 Airport Way S. Seattle, WA 98108 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b> 10/3/88	<b>Amount of Each Receipt this Period</b> 1,000.00
<b>D. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>E. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b> Aggregate Year-to-Date > \$	<b>Date (month, day, year)</b>	<b>Amount of Each Receipt this Period</b>

SUBTOTAL of Receipts This Page (include)

TOTAL This Period (last page this line number only)

6,550.00

21734986

B. MODULE A

AMENDED 10/21/88  
 ITEMIZED RECEIPTS

30 DAY POST ELECTION REPORT

Report of Individual  
 with Salary of the  
 United Executive Pay

1988

FOR 1988

Any information copied from such Reports and Receipts may not be sold or used by any person for the purpose of collecting contributions or for any other purpose other than using the name and address of any individual appearing on such contributions to solicit contributions from such contributors.

NAME OF COMMITTEE (in Full)

Washington State Democratic Central Committee

1988 30 DAY POST-GENERAL REPORT  
 (received 6/21/89)

<p>A. Full Name, Mailing Address and ZIP Code            DEJANET S. WHITE CAMPAN            PO BOX 705            CONVICTION, WA 98532 *</p>	<p>Name of Employer            E</p>	<p>Date (month, day, year)            10/21/88</p>	<p>Amount of Ex-Receipt this Per-            50.00</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8 20.00</p>	
<p>B. Full Name, Mailing Address and ZIP Code            THE BORING COMPANY            PO BOX 3999            SEATTLE, WA 98124 *</p>	<p>Name of Employer</p>	<p>Date (month, day, year)            10/21/88</p>	<p>Amount of Ex-Receipt this Per-            2500.00</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8 2500.00</p>	
<p>C. Full Name, Mailing Address and ZIP Code            MAX VERICH CAMPAN FUND            4303 68TH AVE NE            OLYMPIA, WA 98506 *</p>	<p>Name of Employer</p>	<p>Date (month, day, year)            11/4/88</p>	<p>Amount of Ex-Receipt this Per-            100.00</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8 100.00</p>	
<p>D. Full Name, Mailing Address and ZIP Code            COMMITTEE TO RE-ELECT DOWNS            DOWNS            910 CENTER FINANCIAL CENTER            TUCKER, WA 98201 *</p>	<p>Name of Employer</p>	<p>Date (month, day, year)            11/6/88</p>	<p>Amount of Ex-Receipt this Per-            100.00</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8 100.00</p>	
<p>E. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Ex-Receipt this Per-</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8</p>	
<p>F. Full Name, Mailing Address and ZIP Code</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Ex-Receipt this Per-</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8</p>	
<p>G. Full Name, Mailing Address and ZIP Code            * RICHIE DEPOSITED IN ARKIE            ALLIANT THROUGH FRANK</p>	<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Ex-Receipt this Per-</p>
<p>Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Occupation</p>	<p>Aggregate Year-to-Date &gt; 8</p>	

SUBTOTAL of Receipts This Page (optional)

TOTAL The Period (last page this line number only)

2750.00

910408649222



# SCHEDULE A

## ITEMIZED RECEIPTS

Attachment L

Use this space to report any other receipts not reported on Schedule A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, or any other schedule.

PAGE 1 OF 1  
2-12  
11/1/89

NAME OF COMMITTEE (in Full)  
Washington State Democratic Central Committee

AMENDED 1988 30 DAY POST-GENERAL  
REPORT (received 8/22/89)

<p>A Full Name, Mailing Address and ZIP Code Laborers Political League 905 16th St NW Washington, D.C. 20006</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5000.00</p>	<p>Date (month day, year) 10/25/88</p> <p>Amount of Each Receipt for this Period 5000.00</p>
<p>B Full Name, Mailing Address and ZIP Code United Food &amp; Commercial Workers Active Ballot Club 1775 Y Street Washington, D.C. 20006</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5,000.00</p>	<p>Date (month day, year) 10/24/88</p> <p>Amount of Each Receipt for this Period 5,000.00</p>
<p>C Full Name, Mailing Address and ZIP Code Seafarers Political Activity Function 5221 Auth Way Bonn Springs, MD 20746</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5000.00</p>	<p>Date (month day, year) 10/24/88</p> <p>Amount of Each Receipt for this Period 5,000.00</p>
<p>D Full Name, Mailing Address and ZIP Code MEBA POLITICAL ACTION FUND 444 N CAPITOL ST NW WASHINGTON, DC 20001</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5000.00</p>	<p>Date (month day, year) 11/7/88</p> <p>Amount of Each Receipt for this Period 5000.00</p>
<p>E Full Name, Mailing Address and ZIP Code PRISET 500 1427 21ST ST. NW WASHINGTON DC 20036</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5000.00</p>	<p>Date (month day, year) 11/7/88</p> <p>Amount of Each Receipt for this Period 5000.00</p>
<p>F Full Name, Mailing Address and ZIP Code 46 ELECTRICAL WORKERS PAC 2700 1ST AVE SEATTLE, WA 98121</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 5000.00</p>	<p>Date (month day, year) 11/7/88</p> <p>Amount of Each Receipt for this Period 150.00</p>
<p>G Full Name, Mailing Address and ZIP Code INTERNATIONAL LONGSHOREMAN'S LOCAL 19 511 FERRY TACOMA, WA 98405</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employee</p> <p>Occupation</p> <p>Aggregate Year-to-Date &gt; \$ 2000.00</p>	<p>Date (month day, year) 11/7/88</p> <p>Amount of Each Receipt for this Period 2000.00</p>

01040864923

27150.00  
51171.40



**SCHEDULE A**

### ITEMIZED RECEIPTS

Attachment M

The average estimate is for each category of the Statistical Summary Page

PAGE 01  
TOR 12  
11 (c)

Any information contained on such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for purposes other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Washington State Democratic Central Committee

AMENDED 1988 30 DAY POST-  
GENERAL REPORT (received  
8/21/89)

A Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Laborers Political League 905 16th St NW Washington, D.C. 20006			10/25/88	5000.00
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$ 5,000.00	
B Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
United Food & Commercial Workers Active Ballot Club 1775 F Street Washington, D.C. 20006			10/24/88	5,000.00
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$ 5,000.00	
C Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Senators Political Activity Donation 5201 Auth Way Bann Springs, MD 20746			10/28/88	5,000.00
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$ 5,000.00	
D Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
MEBA POLITICAL ACTION FUND 444 N CAPITOL ST NW WASHINGTON, DC 20001			11/7/88	5000.00
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$ 5000.00	
E Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
PROJECT 500 1427 21ST ST. NW WASHINGTON DC 20036			11/7/88	5000.00
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$ 5000.00	
F Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$	
G Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Other (Specify) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		
		Aggregate Year-to-Date	\$	

Set 1 - A

707

25000.00

**SCHEDULE A**

**ITEMIZED RECEIPTS**

Attachment N

Use separate schedule for each of the following categories of receipts:  
 1. Political Contributions  
 2. Charitable Contributions  
 3. Miscellaneous Contributions

Page 1 of 1  
 Form No. 10-88  
 11/6

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial or political purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

AMENDED 1988 30 DAY POST-GENERAL REPORT (received

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE 8/21/89)

A. Full Name, Mailing Address and ZIP Code

PUBLIC EMPLOYEES ASSN. CLERK.  
 4910 A ST. SE  
 PACIFIC, WA 98047

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

12/2/88

2002.00

B. Full Name, Mailing Address and ZIP Code

WA. EDUCATION ASSN - FUISE  
 33434 8TH S.  
 FEDERAL WAY, WA 98003

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

12/2/88

750.00

C. Full Name, Mailing Address and ZIP Code

WA. STATE LABOR COUNCIL -  
 CCA COMMITTEE  
 201 ELLIOT AVE W  
 SEATTLE, WA 98119

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

12/2/88

250.00

D. Full Name, Mailing Address and ZIP Code

INTERNATIONAL LONGSHOREMEN'S  
 LOCAL 14  
 810 FERRY  
 TACOMA, WA 98405

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

11/7/88

2000.00

E. Full Name, Mailing Address and ZIP Code

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

F. Full Name, Mailing Address and ZIP Code

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

G. Full Name, Mailing Address and ZIP Code

Receipt For ☐ Primary ☐ General  
☐ Other (specify)

Name of Employer

Date (month, day, year)

Amount of Each Receipt this Period

Occupation

Aggregate Year-to-Date > 8

SUBTOTAL of Receipts This Page (optional)

3200.00

TOTAL This Period (last page this line number only)

5227.00

Attachment 0

## 1988 YEAR END REPORT

Washington State Democratic Central Committee

A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
SIO OF AA 5201 Auth Way Camp Springs 20746 Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	12/2/88	125.00
Aggregate Year-to-Date		125.00		
B. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
EDUCATION ASSOCIATION - FULL SE 3131 83 S. CAMP SPRINGS, WA 98003 Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	12/2/88	750.00
Aggregate Year-to-Date		750.00		
C. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
WASH STATE LABOR COUNCIL - AD COMRADE 11111 11111 AVE W. SEATTLE, WA 98119 Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	12/2/88	250.00
Aggregate Year-to-Date		250.00		
D. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ILLINOIS EMPLOYERS ACTION COMMITTEE 11111 A ST SE CAMP SPRINGS, WA 98047 Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation	12/2/88	200.00
Aggregate Year-to-Date		200.00		
E. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
Aggregate Year-to-Date				
F. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
Aggregate Year-to-Date				
G. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
Aggregate Year-to-Date				
B. TOTAL of Receipts This Page (optional)				
TOTAL This Period (list page this line number only)				1325.00

SCHEDULE A

## ITEMIZED RECEIPTS

1988 YEAR END REPORT

FEDERAL ELECTION COMMISSION

Full Time Election

12

Any information supplied from such Reports and Statements may not be used by any person for the purpose of making contribution to the campaign of any candidate, office, party, group, or other political committee or union (hereinafter "recipient") from such organizations.

NAME OF CONTRIBUTOR OR FUND

## NATIONAL STATE DEMOCRATIC CENTRAL COMMITTEE

<b>A. Full Name, Mailing Address and ZIP Code</b> DEMOCRATIC NATIONAL COM. - SERVICES CAMP 430 S. CAPITOL ST SE WASHINGTON DC 20003 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8	<b>Date (month, day, year)</b> 11/1/88	<b>Amount of Each Receipt this Period</b> 10000.00
<b>B. Full Name, Mailing Address and ZIP Code</b> " " " " " " Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8 = 2260.00	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 13260.00
<b>C. Full Name, Mailing Address and ZIP Code</b> " " " " " " Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8 = 25540.00	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 22500.00
<b>D. Full Name, Mailing Address and ZIP Code</b> MASON COUNTY DEMO COM. - BOX 776 SHELBY, TN 38584 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8 = 500.00	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 500.00
<b>E. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 0.00
<b>F. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 0.00
<b>G. Full Name, Mailing Address and ZIP Code</b>  Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date</b> > 8	<b>Date (month, day, year)</b> 11/2/88	<b>Amount of Each Receipt this Period</b> 0.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

26010.00

910403864938



**MODULE A**

Attach  
ment Q

Washington State Department of Social & Health Services  
 DEPARTMENT OF SOCIAL & HEALTH SERVICES  
 1988 YEAR-END REPORT (received 6/21/89)

93 in 04303864948

<p>A. Full Name, Mailing Address and ZIP Code  <b>THE AMERICAN ASSOCIATION FOR THE DEAF</b>  <b>PO BOX 32759</b>  <b>SEATTLE WA 98111</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>THE AMERICAN ASSOCIATION FOR THE DEAF</b></p> <p>Occupation  <b>ADMINISTRATIVE</b></p>	<p>Date (month, day, year)  <b>12/1/88</b></p>	<p>Amount of Each Receipt this Period  <b>125.00</b></p>
<p>B. Full Name, Mailing Address and ZIP Code  <b>CHARITABLE FOUNDATION</b>  <b>925 15th Ave</b>  <b>SEATTLE, WA 98122</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>CHARITABLE FOUNDATION</b></p> <p>Occupation  <b>ADMINISTRATIVE</b></p>	<p>Date (month, day, year)  <b>12/1/88</b></p>	<p>Amount of Each Receipt this Period  <b>125.00</b></p>
<p>C. Full Name, Mailing Address and ZIP Code  <b>RE-ELECT COMMITTEE FOR PAUL CAMERON</b>  <b>45 PINNELL ROAD</b>  <b>SEATTLE, WA 98102</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>RE-ELECT COMMITTEE FOR PAUL CAMERON</b></p> <p>Occupation  <b>ADMINISTRATIVE</b></p>	<p>Date (month, day, year)  <b>12/1/88</b></p>	<p>Amount of Each Receipt this Period  <b>125.00</b></p>
<p>D. Full Name, Mailing Address and ZIP Code  <b>ROW DOTZNER ASSOCIATES INC.</b>  <b>41 QUEEN ANNE AVE. #1500</b>  <b>SEATTLE, WA 98109</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>ROW DOTZNER ASSOCIATES INC.</b></p> <p>Occupation  <b>ADMINISTRATIVE</b></p>	<p>Date (month, day, year)  <b>12/1/88</b></p>	<p>Amount of Each Receipt this Period  <b>125.00</b></p>
<p>E. Full Name, Mailing Address and ZIP Code  <b>UNITED TRANSPORTATION GROUP</b>  <b>1501 5 CAPITAL WAY, ROOM 305</b>  <b>OLYMPIA WA 98501</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer  <b>UNITED TRANSPORTATION GROUP</b></p> <p>Occupation  <b>ADMINISTRATIVE</b></p>	<p>Date (month, day, year)  <b>12/1/88</b></p>	<p>Amount of Each Receipt this Period  <b>125.00</b></p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code  <b>*MONEY DEPOSITED IN WACOM/4</b>  <b>ACCOUNT THROUGH BANK</b></p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General  <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>SUBTOTAL of Receipts This Page (optional)</p>			
<p>TOTAL This Period (last page this line number only)</p>			<p><b>675.00</b></p>



FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 4APR90

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE CONNECTED ORGANIZATION:				ID #C00114439	PARTY QUALIFIED	
1987	MID-YEAR REPORT	125,440	106,580	1JAN87 -30JUN87	23	87FEC/481/3592
	YEAR-END	133,638	148,894	1JUL87 -31DEC87	24	88FEC/504/0670
	YEAR-END - AMENDMENT	132,138	148,894	1JUL87 -31DEC87	14	88FEC/520/3360
	YEAR-END - AMENDMENT	133,638	148,894	1JUL87 -31DEC87	11	88FEC/533/4370
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	4	88FEC/512/0810
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	5	88FEC/515/1715
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	2	88FEC/528/2574
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	3	88FEC/530/4606
1988	APRIL QUARTERLY	42,834	59,902	1JAN88 -31MAR88	18	88FEC/520/1475
	APRIL QUARTERLY - AMENDMENT	42,834	61,402	1JAN88 -31MAR88	5	88FEC/533/4381
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -31MAR88	3	89FEC/598/1018
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -31MAR88	6	89FEC/608/0679
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -31MAR88	1	90FEC/620/0922
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	1	88FEC/543/2366
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31MAR88	2	88FEC/545/5293
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	3	89FEC/606/4131
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	9	89FEC/617/5189
	JULY QUARTERLY	75,838	70,537	1APR88 -30JUN88	11	88FEC/536/2952
	JULY QUARTERLY - AMENDMENT	-	-	1APR88 -30JUN88	1	89FEC/598/1021
	JULY QUARTERLY - AMENDMENT	79,211	71,069	1APR88 -30JUN88	3	89FEC/606/4747
	JULY QUARTERLY - AMENDMENT	-	-	1APR88 -30JUN88	8	89FEC/608/0643
	JULY QUARTERLY - AMENDMENT	79,211	71,069	1APR88 -30JUN88	2	89FEC/608/0672
	REQUEST FOR ADDITIONAL INFORMATION			1APR88 -30JUN88	4	89FEC/606/4115
	PRE-PRIMARY	77,260	50,562	1JUL88 -31AUG88	4	89FEC/606/4750
	PRE-PRIMARY - AMENDMENT	78,028	50,565	1JUL88 -31AUG88	14	89FEC/608/0731
	PRE-PRIMARY - AMENDMENT	77,260	50,562	1JUL88 -31AUG88	3	89FEC/608/0675
	OCTOBER QUARTERLY	196,489	121,516	1JUL88 -30SEP88	18	88FEC/574/2271
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL88 -30SEP88	3	89FEC/589/1943
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL88 -30SEP88	1	89FEC/589/3604
	OCTOBER QUARTERLY - AMENDMENT	-	-	1SEP88 -30SEP88	2	89FEC/598/1029
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL88 -30SEP88	1	89FEC/598/1022
	OCTOBER QUARTERLY - AMENDMENT	119,153	72,406	1SEP88 -30SEP88	4	89FEC/606/4754
	OCTOBER QUARTERLY - AMENDMENT	-	-	1SEP88 -30SEP88	1	89FEC/608/0730
	OCTOBER QUARTERLY - AMENDMENT	119,153	72,406	1SEP88 -30SEP88	3	89FEC/608/0668
	NOTICE OF FAILURE TO FILE			1JUL88 -30SEP88	1	88FEC/564/5408
	REQUEST FOR ADDITIONAL INFORMATION			1JUL88 -30SEP88	1	89FEC/584/3637
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL88 -30SEP88	3	89FEC/586/3872
	REQUEST FOR ADDITIONAL INFORMATION			1SEP88 -30SEP88	3	89FEC/606/4122
	PRE-GENERAL	64,189	70,019	1OCT88 -19OCT88	10	88FEC/574/2261
	PRE-GENERAL - AMENDMENT	64,189	71,019	1OCT88 -19OCT88	6	89FEC/589/1937
	PRE-GENERAL - AMENDMENT	62,822	71,345	1OCT88 -19OCT88	2	89FEC/597/1509
	PRE-GENERAL - AMENDMENT	-	-	1OCT88 -19OCT88	4	89FEC/598/1024
	PRE-GENERAL - AMENDMENT	62,822	71,345	1OCT88 -19OCT88	3	89FEC/606/4758
	PRE-GENERAL - AMENDMENT	-	-	1OCT88 -19OCT88	18	89FEC/608/0711

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Page 2 of 3

FEDERAL ELECTION COMMISSION  
1987-1988  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 4APR90

PAGE 2

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
PRE-GENERAL	- AMENDMENT	62,822	71,345	10CT88 -190CT88	2	89FEC/608/0665
PRE-GENERAL	- AMENDMENT	-	-	10CT88 -190CT88	1	90FEC/620/0921
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -190CT88	1	89FEC/584/3644
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT88 -190CT88	3	89FEC/586/3869
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -190CT88	6	89FEC/606/4103
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -190CT88	1	89FEC/606/4120
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT88 -190CT88	1	89FEC/608/3805
REQUEST FOR ADDITIONAL INFORMATION				10CT88 -190CT88	9	89FEC/617/5180
REQUEST FOR ADDITIONAL INFORMATION 2ND				10CT88 -190CT88	10	90FEC/619/2221
POST-GENERAL		143,924	93,128	200CT88 -28NOV88	1	89FEC/597/1512
POST-GENERAL	- AMENDMENT	-	-	200CT88 -28NOV88	3	89FEC/598/1032
POST-GENERAL	- AMENDMENT	156,924	145,105	200CT88 -28NOV88	7	89FEC/606/4761
POST-GENERAL	- AMENDMENT	143,924	93,128	200CT88 -28NOV88	24	89FEC/608/0686
POST-GENERAL	- AMENDMENT	143,924	93,128	200CT88 -28NOV88	24	89FEC/608/0618
POST-GENERAL	- AMENDMENT	156,924	145,105	200CT88 -28NOV88	6	89FEC/608/0658
POST-GENERAL	- AMENDMENT	-	-	200CT88 -28NOV88	5	90FEC/620/0086
REQUEST FOR ADDITIONAL INFORMATION 2ND				200CT88 -18NOV88	9	90FEC/619/2202
NOTICE OF FAILURE TO FILE				28NOV88	1	89FEC/576/2087
REQUEST FOR ADDITIONAL INFORMATION				200CT88 -28NOV88	4	89FEC/606/4126
REQUEST FOR ADDITIONAL INFORMATION				200CT88 -28NOV88	8	89FEC/617/5173
YEAR-END		194,218	169,288	200CT88 -31DEC88	25	89FEC/584/3729
YEAR-END	- AMENDMENT	186,018	169,288	200CT88 -31DEC88	12	89FEC/590/4659
YEAR-END	- AMENDMENT	-	-	200CT88 -31DEC88	3	89FEC/594/1308
YEAR-END	- AMENDMENT	64,434	80,440	29NOV88 -31DEC88	6	89FEC/597/1514
YEAR-END	- AMENDMENT	61,058	80,430	29NOV88 -31DEC88	9	89FEC/598/1036
YEAR-END	- AMENDMENT	-	-	200CT88 -31DEC88	5	89FEC/600/0432
YEAR-END	- AMENDMENT	33,516	80,436	29NOV88 -31DEC88	5	89FEC/606/4768
YEAR-END	- AMENDMENT	-	-	29NOV88 -31DEC88	1	89FEC/608/0617
YEAR-END	- AMENDMENT	33,516	80,436	29NOV88 -31DEC88	5	89FEC/608/0652
YEAR-END	- AMENDMENT	-	-	200CT88 -31DEC88	1	90FEC/620/0923
REQUEST FOR ADDITIONAL INFORMATION				200CT88 -31DEC88	5	89FEC/590/0532
REQUEST FOR ADDITIONAL INFORMATION				200CT88 -31DEC88	1	89FEC/596/5216
REQUEST FOR ADDITIONAL INFORMATION 2ND				200CT88 -31DEC88	1	89FEC/598/4424
REQUEST FOR ADDITIONAL INFORMATION				29NOV88 -31DEC88	4	89FEC/606/4110
REQUEST FOR ADDITIONAL INFORMATION				200CT88 -31DEC88	9	89FEC/617/5163
REQUEST FOR ADDITIONAL INFORMATION 2ND				200CT88 -31DEC88	9	90FEC/619/2193
TOTAL		830,798	0 807,799	0	495	TOTAL PAGES

All reports listed above have been reviewed.  
Outstanding debts owed by/to the committee as of 12/31/88--\$0.00  
Ending Cash-on-Hand as of 12/31/83--\$39300.61

FEDERAL ELECTION COMMISSION  
1989-1990  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 26APR90

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE				ID #C00114439 PARTY QUALIFIED		
CONNECTED ORGANIZATION: WASHINGTON STATE DEMOCRATIC PARTY						
	1989 REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN89 -31MAR89	10	90FEC/619/2211
	MID-YEAR REPORT	343,846	385,083	1JAN89 -30JUN89	27	89FEC/605/0211
	MID-YEAR REPORT - AMENDMENT	343,846	384,265	1JAN89 -30JUN89	5	89FEC/606/3168
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN89 -30JUN89	4	90FEC/621/3280
	MID-YEAR REPORT - AMENDMENT	343,846	384,265	1JAN89 -30JUN89	12	90FEC/622/4160
	REQUEST FOR ADDITIONAL INFORMATION			1JAN89 -30JUN89	1	90FEC/619/0615
	REQUEST FOR ADDITIONAL INFORMATION			1JAN89 -30JUN89	1	90FEC/619/0617
	YEAR-END	280,554	280,097	1JUL89 -31DEC89	36	90FEC/623/1514
	YEAR-END - AMENDMENT	-	-	1JUL89 -31DEC89	17	90FEC/632/3171
	YEAR-END - AMENDMENT	280,554	275,097	1JUL89 -31DEC89	5	90FEC/636/3514
	REQUEST FOR ADDITIONAL INFORMATION			1JUL89 -31DEC89	2	90FEC/630/4020
	1990 APRIL QUARTERLY	96,107	99,176	1JAN90 -31MAR90	20	90FEC/636/3519
	TOTAL	720,507	0 758,538 0		140	TOTAL PAGES

Ending cash-on-hand as of 3/31/90: \$2,769

Outstanding debts owed by the committee as of 3/31/90: \$0

All reports have been reviewed except the amended Year End reports and the 1990 April Quarterly Report.

91040864931



FEDERAL ELECTION COMMISSION  
WASHINGTON D.C. 20461

RQ-2

MAR 29 1989

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C00114439

Reference: Year End Report (10/20/88-12/31/88)

Dear Mr. Bleck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to

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influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Your report discloses a receipt from the International Local 19, which appears to be a labor organization. You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. §441b(a)) If you have received a labor organization contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contributions. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

91040864933

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

91040864934

KAREN MARCHAND  
STATE

Attachment 3  
Page 1 of 7

09 APR 10 1989

April 7, 1989

Ref: CC00114439

Donald Averett  
Reports Analysis Division  
Federal Election Commission  
999 E. Street N.W.  
Washington, D.C. 20463

Dear Mr. Averett,

This letter is in response to your letter of March 29, 1989, concerning our report for the period 10/20/88 through 12/31/88.


The contributions questioned in your letter were inadvertently deposited in our Federal Account due to a book-keeping error. They should have been deposited in our State and Local Account.

The total amount in question has been transferred from our Federal Account to our State and Local Account. A copy of the check accomplishing this is enclosed. I have also sent letters to each of the contributors informing them of this action for their approval.

At all times subsequent to the deposit of these funds in our Federal Account that account contained a balance sufficient to ensure that no prohibited funds were expended on activities subject to the Act.

Sincerely yours,

*Jeff Smith*  
Jeff Smith

<b>WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE</b>		<b>2033</b>	
MEMBER ACCOUNT 1701 SMITH TOWER PM. BOX 641-0004 SEATTLE, WA 98164		4/7 1989 18-57 1230	
PAY TO THE ORDER OF	W.D.C.C. - 1st & 2nd Amount	\$ 3200.00	
<i>Split Edward &amp; Tom Howard 1st</i>		DOLLARS	
		<i>For Howard</i>	
FOR DEPOSIT IN THE BANK OF AMERICA		<i>For Howard</i>	
P002033P 01250005741: 256 0953 81			

635:666  
92619001016



KAREN MARCHIORO

Page 3 of 7

JOHN SMITH  
SECRETARY

4/7/89

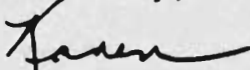
Washington Education Association/PULSE  
33434 8th S.  
Federal Way, WA 98003

Dear Friend:

In reviewing our Federal Election Commission reports for 1988 we have discovered that due to a bookkeeping error your contribution of \$750.00 was deposited in the federal account by mistake. It should have been deposited in our state and local account.

In accordance with FEC instructions we have transferred that amount of money from our federal account to our state and local account. If you have any questions or problems with this procedure please let us know.

Sincerely,



Karen Marchioro

91040864937

N MARCHIORO

JEFF SMITH  
EXECUTIVE DIRECTOR

Page 4 of 7

4/7/89

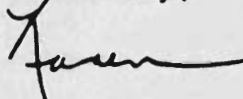
Washington State Labor Council  
201 Elliot Ave. W.  
Seattle, WA 98119

8 Dear Friend:

3 In reviewing our Federal Election Commission reports for  
9 1988 we have discovered that due to a bookkeeping error your  
6 contribution of \$250.00 was deposited in the federal account  
4 by mistake. It should have been deposited in our state and  
3 local account.

6 In accordance with FEC instructions we have transferred  
3 that amount of money from our federal account to our state  
0 and local account. If you have any questions or problems with  
4 this procedure please let us know.

Sincerely,

  
Karen Marchioro

702

6) 883 0864 P.O. BOX 4027 SEATTLE WASH. 98104

KAREN MARCHIORO  
STATE TREASURER

JOHN CHRYSTAL  
SEATTLE CITY CLERK

Page 5 of 7

4/7/89

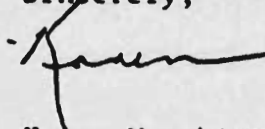
International Longshoreman's Local 19  
810 Ferry  
Tacoma, WA 98405

Dear Friend:

In reviewing our Federal Election Commission reports for 1988 we have discovered that due to a bookkeeping error your contribution of \$2,000 was deposited in the federal account by mistake. It should have been deposited in our state and local account.

In accordance with FEC instructions we have transferred that amount of money from our federal account to our state and local account. If you have any questions or problems with this procedure please let us know.

Sincerely,



Karen Marchioro

706

106) 583 0684 P.O. BOX 4027 SEATTLE WASH. 98104

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1 MARCH 1989

JEFF BARTON  
SULLY, ONE TWO

Page 6 of 7

4/7/89

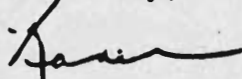
Public Employees Action Committee  
4910 A St. S.E.  
Pacific, WA 98047

Dear Friend:

In reviewing our Federal Election Commission reports for 1988 we have discovered that due to a bookkeeping error your contribution of \$200.00 was deposited in the federal account by mistake. It should have been deposited in our state and local account.

In accordance with FEC instructions we have transferred that amount of money from our federal account to our state and local account. If you have any questions or problems with this procedure please let us know.

Sincerely,



Karen Marchioro

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KAREN MARCHIORO  
CHAIRMAN

JEFF SMITH  
SECRETARY

Page 7 of 7

4/7/89

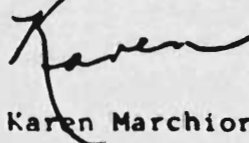
Project 500  
1427 21st St. N.W.  
Washington, D.C. 20036

Dear Friend:

In reviewing our Federal Election Commission reports for 1988 we have discovered that due to a bookkeeping error your contribution of \$5,000 was deposited in the federal account by mistake. It should have been deposited in our state and local account.

In accordance with FEC instructions we have transferred that amount of money from our federal account to our state and local account. If you have any questions or problems with this procedure please let us know.

Sincerely,



Karen Marchioro

91040864941

JOHN EDWIN  
SHILLING DIED

Washington State Democratic Central Committee  
Identification Number: C00114439

Donald L. Averett  
Reports Analyst  
Federal Election Commission  
Washington, D.C. 20463

09 JUN 21 14:10:57  
MAIL DELIVERED

Enclosed find amendments to our FEC reports for 1988. Please note:

1) In reference to your letter of June 7, 1989 our report has been amended to show a \$750 contribution from the Washington Education Association-PULSE, a \$250 contribution from the Washington State Labor Council, and a \$200 contribution from the Public Employees Action Committee. Two contributions, totaling \$7,000 appear on page 11(c), lines E and G of our previously filed 30 day post election report. These five contributions total the \$8,200 you refer to.

**Our cash balance is correctly reflected on the reports amended and filed on June 6.**

2) Your letter prompted a review to determine if other improperly deposited contributions had not been itemized. The enclosed report itemizes these contributions.

3) The checks listed on the 10/1 - 10/19/89 report pages 2 and 3 on line 11(a)iii represent a deposit of \$5,387.99 made to our federal account that should have been made to our state and local account. On that same day we deposited \$7,885 to our state account that had been intended for and was eligible for the federal account. This is a simple case of mixing deposit slips. We will transfer \$5,387.99 to our state and local account to rectify this.

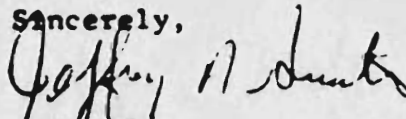
4) Line 15 of the 11/29 - 12/31/88 report has been amended to reflect a refund check listed twice. Line 19 page 3, line 3 has been amended to reflect a copying error.

Attachment 4  
Page 2 of 2

5) The 10/20 - 11/28/88 report has been amended to reflect a yearly total of \$7,500 from The Committee on Letter Carriers (line 11(c)a). \$2,500 of this amount was intended for our state and local account. We will be transferring funds from our federal account to our state and local account to rectify this.

Please contact us if you have any further questions.

Sincerely,

  
Jeff Smith

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**FEDERAL ELECTION COMMISSION**  
WASHINGTON, DC 20543

EQ-2

P.F. 0 100

Clay Block, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C00114439

Reference: Amended April Quarterly Report (1/1/88-3/31/88) dated  
6/20/89

Dear Mr. Block:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemisation follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organisation(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organisations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organisation has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organisation(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you

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choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

37036064132

**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

FD-3

ALG R 100

Way Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C00116439

Reference: Amended July Quarterly Report (4/1/88-6/30/88) dated  
6/20/89

Dear Mr. Bleck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.3(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.3(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you

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WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 2

choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Your report discloses an apparent contribution(s) from a labor organization (pertinent portion(s) attached). You are advised that contributions from labor organizations are prohibited by the Act, unless made from a separate segregated fund established by the labor organization. (2 U.S.C. §441b(a)) If you have received a labor organization contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the

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WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 3

contributions. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Avelett  
Reports Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

BQ-2

25 8 1985

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C90114439

Reference: Amended October Quarterly Report (9/1/88-9/30/88)  
dated 6/20/89

Dear Mr. Bleck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has filed an amendment to the October Quarterly Report (7/1/88-9/30/88), however this amendment does not include financial transactions which occurred between 7/1/88 and 8/31/88. There should not be a gap in the coverage dates for your reports. An amended October Quarterly Report is necessary to disclose the activity from 7/1/88 through 9/30/88.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

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Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20543

**EQ-2**

**ALG R 198**

**Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104**

**Identification Number: C00114439**

**Reference: Amended 12 Day Pre-General Report (10/1/88-10/19/88)  
dated 6/20/89**

**Dear Mr. Bleck:**

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you

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**WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 2**

choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contribution. See 11 CFR 103.3(b). Refunds and

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WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 3

transfers-out should be disclosed on a supporting Schedule B for Line 26 or 28 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

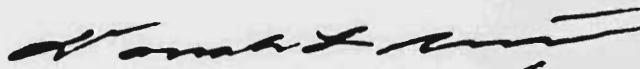
-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$8,375 in contributions from individuals, however, the sum of the entries itemized on Schedule A of your original 12 Day Pre-General Report indicates the total to be \$13,000. Please amend your report to clarify the discrepancy.

-Please provide a Schedule A to support the entry disclosed on Line 11(b) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(B).

-Please provide a Schedule A to support the entry disclosed on Line 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(B).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20543

ED-2

Clay Block, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

RE c 100

Identification Number: C00114439

Reference: Amended 30 Day Post-General Report (10/20/88-  
11/28/88) dated 6/20/89

Dear Mr. Block:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-You have provided an amendment to the 30 Day Post-General Report, however, your committee has not filed an original of this report. Instead, your committee has filed a Year End Report (10/20/88-12/31/88). Any changes in activity which occurred during this period should be disclosed on an Amended Year End Report (10/20/88-12/31/88). Please provide a full report, including all supporting schedules, to clarify the apparent increase in financial activity during this period.

-Line 11(a)(i) of the Detailed Summary Page discloses a figure for the total amount of itemized contributions from individuals/persons other than political committees. In addition, no supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year. 11 CFR 104.3(a)(2).

-Please provide a Schedule A to support the entry disclosed on Line 11(b) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(B).

-Your report discloses an apparent contribution(s) from a corporation(s) (pertinent portion attached). You are

91040864954  
92036064126

advised that a contribution from a corporation is prohibited by the Act, unless made from a separate segregated fund established by the corporation. (2 U.S.C. §441b(a)) If you have received a corporate contribution(s), the Commission recommends that you refund the full amount to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contribution. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity,

93104308649575

**WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 3**

either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

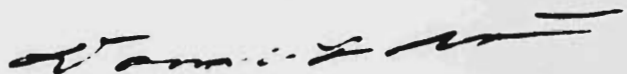
Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

8 0 3 6 0 6 4 1 2 9





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20543

EO-2

ALG a mro

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C00114639

Reference: Amended Year End Report (11/29/88-12/31/88) dated  
6/20/89

Dear Mr. Bleck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your committee has provided an amendment to the Year End Report, however, this amendment does not include the entire period covered by the original Year End Report. Any changes in activity which occurred during this period should be disclosed on an Amended Year End Report (10/20/88-12/31/88). Please provide a full report, including all supporting schedules, to clarify the apparent increase in financial activity during this period.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one

3103466419157

**WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 2**

account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses apparent contributions from corporations and labor organizations. You are advised that contributions from corporations and labor organizations are prohibited by the Act, unless made from separate segregated funds established by the corporations and labor organizations. (2 U.S.C. §441b(a)) If you have received prohibited contributions, the Commission recommends that you refund the full amount to the donors in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributors in writing and provide the

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9 1 0 4 0 8 6 4 9 5 8

WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
PAGE 3

contributors with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donors for any transfers-out to protect the donors' interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds and transfers-out should be made within thirty days of the treasurer's receipt of the contribution. See 11 CFR 101.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contributions in question were incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee to refund or transfer-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

9104080649129  
3036

To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89

From: Washington State Democratic Central Committee  
C00114439

Reference: Amended April Quarterly Report (1/1/88-3/31/88)  
dated 6/20/89

Dear Mr. Averett:

The four contributions indicated in your letter of 8/8/89 were not eligible for use in federal campaigns. All were deposited due to a bookkeeping error in our federal account. Please note the following:

1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.

2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.

3) All these contributions have been properly reported to the state Public Disclosure Commission.

4) Copies of letters informing the original contributors of this transfer are enclosed.

Should you have further questions contact us at (206) 583-0664.

HAND DELIVERED  
89 AUG 22 AM 10:49

RECEIVED  
FEDERAL ELECTIONS COMMISSION  
WASHINGTON, D.C.

2-1040864960  
8003638377



WASHINGTON STATE DEMOCRATIC  
GENERAL COMMITTEE

1200 4TH AVENUE, SUITE 100  
SEATTLE, WA 98101

2086

6/30 1979 10:37

FOR  
DEPOSIT

Indygo 144 Avenue 1st Avenue 182700.00

Indygo 144 Avenue 1st Avenue 182700.00 DOLLARS

FOR  
DEPOSIT

Indygo 144 Avenue 1st Avenue 182700.00

Indygo 144 Avenue 1st Avenue 182700.00

Indygo 144 Avenue 1st Avenue 182700.00

11656805803118

to: People for Ken Jacobsen

From: Washington State Democratic Central Committee

Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$50 on 2/4/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

910408649612  
3:33

This letter is to inform you that through a banking error your contribution of \$25 on 1/7/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

Page 5 of 48

To: The Royer Committee  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$25 on 3/29/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

910408064964  
317360835934



RECEIVED  
SEP 11 1989

RECEIVED  
SEP 11 1989

Page 6 of 48

To: Democratic Majority Committee  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$410 on 3/23/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

91040864965  
3:036080391

Page 7 of 48

To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89

From: Washington State Democratic Central Committee  
C00114439

Reference: Amended July Quarterly Report (4/1/88-6/30/88)  
dated 6/20/89

Dear Mr. Averett:

The contributions noted in your letter of 8/8/89 were not eligible for use in federal campaigns. All were deposited due to a bookkeeping error in our federal account. Please note the following:

1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.

2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.

3) All these contributions have been properly reported to the state Public Disclosure Commission.

4) Copies of letters informing the original contributors of this transfer are enclosed.

Should you have further questions contact us at (206) 583-0664.

HAND DELIVERED

89 AUG 22 AM 10:49

WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE

MEMBER, ADDRESS  
1201 2ND AVENUE, N.E.  
SEATTLE, WA 98101

2086

6/30 10:29 18:57

TO THE  
TREASURER

Washington State Democratic Central Committee 182700.00  
Pay to the order of *Washington State Democratic Central Committee*

**FOOT**  
PRINTED

FOR CASH ONLY

POD 2086P 01250005740 255 0963 80

*Robert H. H. H.*  
DOLLARS

1190809000

Page 9 of 48

To: June Leonard Campaign

From: Washington State Democratic Central Committee

Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$50 on 5/26/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

91040864968  
3103603051



Page 10 of 48

To: Committee for Ernest Crane  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$100 on 5/26/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

910408664969  
3173603331

**SECRET**

1040004970  
3756030547

**To: Frank Warnke Campaign Fund**  
**From: Washington State Democratic Central Committee**  
**Date: 8/16/89**

This letter is to inform you that through a banking error your contribution of \$50 on 6/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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To: Citizens to Elect George Masten  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$65 on 6/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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31736



To: Washington State Employees Local 504  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$25 on 6/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE  
FEDERAL ACCOUNT  
1701 NORTH TOWER, PM. BOX 400-0001  
SEATTLE, WA 98104

2086

6/30 1039 457

Washington State Democratic Central Committee, \$2700.00

Pay to the order of

Car Howard Lewis

FOR DEPOSIT ONLY

FOR DEPOSIT ONLY - *W. J. Lewis*

2002086 41250005742 256 0963 80

DOLLARS

*R. J. Lewis*

To: Committee for Dolores Sibonga  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$50 on 8/12/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

CLARENCE BARRINGTON

JEFF BARTON

Page 17 of 48

To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89

*Jeff A. Barton*

From: Washington State Democratic Central Committee  
(00114439)

Reference: Amended October Quarterly Report (9/1/88-9/30/88)  
dated 6/20/89

Dear Mr. Averett:

In your letter of 8/8/89 you state that the amendment filed on 6/20/89 to our Third Quarter Report (1988) fails to cover the period 7/1/88-9/30/88. On 6/6/89 a 12-Day Preceding the Election Report was filed covering the time period of 7/1/88-9/31/88. The amendments of 6/20/89 to the Third Quarter Report in no way changed the information contained in the 12-Day Preceding the Election Report.

The contribution you refer to was not eligible for use in federal campaigns. . . was deposited due to a bookkeeping error in our federal account. Please note the following:

- 1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.
- 2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.
- 3) All these contributions have been properly reported to the state Public Disclosure Commission.
- 4) Copies of letters informing the original contributors of this transfer are enclosed.

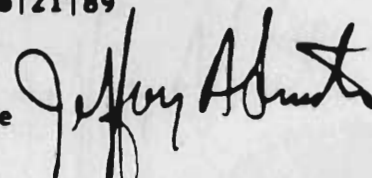
Should you have further questions contact us at (206) 563-0654.

89 AUG 22 11:10:50  
HAND RECORDED



To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89



From: Washington State Democratic Central Committee  
C00114439

Reference: Amended 12 Day Pre-General Report (10/1/88-10/19/88)  
dated 6/20/89

Dear Mr. Averett:

In your letter of 8/8/89 you ask us to explain the change on Line 11(a)(1) from \$13,000 in our original report to \$8375 in our 6/20/89 amended report. The difference reflects two changes. First, \$375.00 in contributions is added (shown on page 2 of Line 11(a)(1)) to our 6/20/89 report. Second, the \$5,000.00 contribution from Catherine Conover shown in our original report is deleted. Due to a mix-up the bank deposit including the Conover check was mistakenly deposited to our state account. Those contributions you note from 10/13/88 that were not permissible for our federal account were to have been deposited at the same time in our state account. The deposits were switched.

The Schedule A's you request for lines 11(b) and 11(c) were filed with you on 6/6/89. Another copy of each is enclosed.

The contributions which you note were not eligible for use in federal campaigns. All were deposited due to a book-keeping error in our federal account. Please note the following:

1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.

2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.

3) All these contributions have been properly reported to the state Public Disclosure Commission.

4) Copies of letters informing the original contributors of this transfer are enclosed.

Should you have further questions contact us at (206) 462-0004.

8/21/89  
HAND DELIVERED



To: Committee to Elect Marc Gaspard  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$500 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

To: Committee to Elect Art Wang  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$750 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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Page 22 of 48

To: Lawpac

From: Washington State Democratic Central Committee

Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$250 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

91040864981  
: 303J717

Page 23 of 48

To: Committee for Brian Ebersole  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$250 on 10/13/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

To: Washington State Labor Council  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$500 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

910408307183

Page 25 of 48

To: NSEA-LPA

From: Washington State Democratic Central Committee

Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$500 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

91040864984  
33333J71

WASH. STATE DEMOCRATIC

JOHN BARTON  
PRESIDENT

Page 26 of 48

To: Committee to Elect Art Wang  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$250 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

9,104,086,498.5



WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE

2085

FUNDING ACCOUNT  
1101 SMITH TOWER, P.O. BOX 463-0004  
SEATTLE, WA 98104

6/23 1089 1487

FOR  
TO THE  
ORDER OF

WACIC

184000.00

Five thousand four hundred dollars

HOI  
FUNDING

non interest bearing and is for use

Stephen H. Smith  
President, WACIC

Account # 0020850 01250005740 236 0963 80

9 8 6 4 9 8 0 4 0 1 6

to: Marlin Appelwick Election Committee  
from: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$500 on 10/3/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

OFFICE OF THE  
ATTORNEY GENERAL

OFFICE OF THE  
ATTORNEY GENERAL

Page 29 of 48

To: People for Joe King

From: Washington State Democratic Central Committee

Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$500 on 10/3/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

9104386J479:8.8

CLARENCE BARRINGTON  
Barrington & Co.

CLARENCE BARRINGTON  
Barrington & Co.

Page 30 of 48

to: Edmonds Education Association  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$2000 on 10/13/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

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7330307

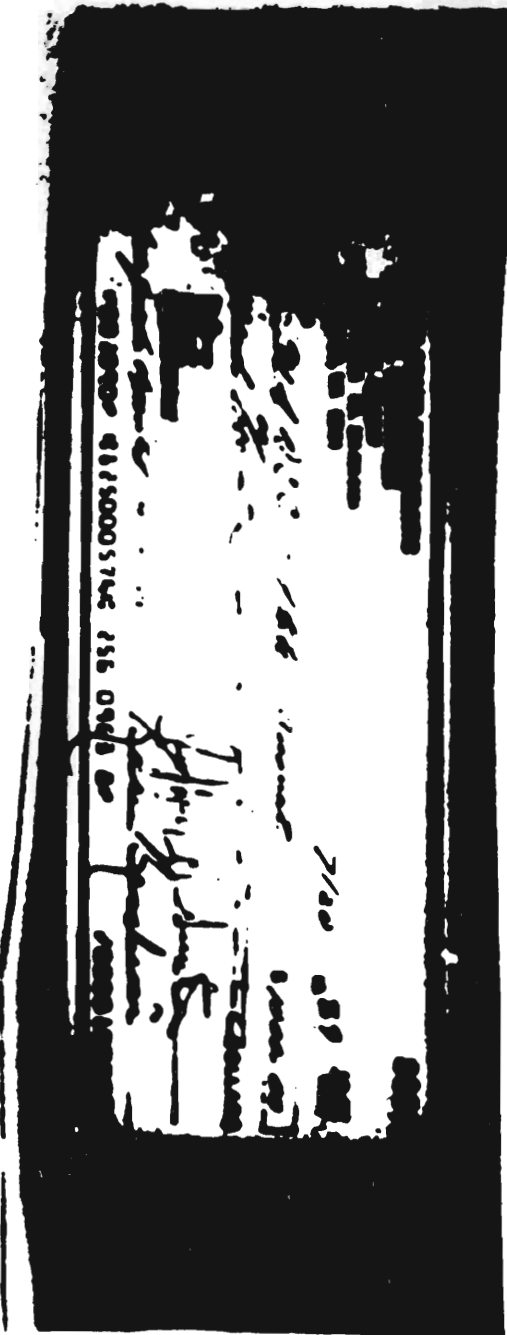
[illegible]



To: Bev Goodman Committee  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$387.99 on 10/13/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

21043082614991



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WASHINGTON STATE DEMOCRATIC  
GENERAL COMMITTEE

1201 SUMMIT TOWER, P.O. BOX 350000  
SEATTLE, WA 98135

2084

6/18 10:35 1P-87

Pay to the order of Mr. & Mrs. David L. Smith \$ 600.00

Five hundred and no/100 DOLLARS

David L. Smith

FOR DEPOSIT ONLY

POD 2084P-0125000574C 256 0963

910080864993;  
3664963616

Page 35 of 48

To: Ron Dotzauer and Associates  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$125 on 12/12/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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Washingon State Democratic Central Committee  
1000 1st Ave. S.E.  
Seattle, WA 98104

Washingon State Democratic Central Committee  
1000 1st Ave. S.E.  
Seattle, WA 98104

Page 36 of 48

To: Re-Election Committee for Paul Conner  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$125 on 12/12/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

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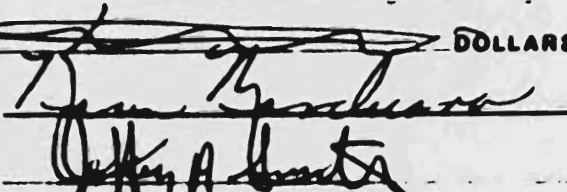


**To: The Royer Committee**  
**From: Washington State Democratic Central Committee**  
**Date: 8/15/89**

This letter is to inform you that through a banking error your contribution of \$125 on 12/2/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

To: Committee to Elect Cal Anderson  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$125 on 12/12/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

<b>WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE</b> FEDERAL ACCOUNT 1701 SMITH TOWER PH. 206-465-0004 SEATTLE, WA 98101		2115 ✓
		8/15 1982
PAY TO THE ORDER OF	W/DC - 15th & 1st Avenue	\$ 125.00
One Hundred Twenty Five <sup>00</sup> / <sub>100</sub>	<del>_____</del>	DOLLARS
 Bank of America Federal Reserve Bank 100 First Ave. S., 98101 Seattle, WA 98101	Deposited in my account for <del>_____</del> <i>Washington State Union and</i>	
⑆002115⑆ 6125000574⑆ 256 0963 ⑆		

01500092018

To: United Transportation Union  
From: Washington State Democratic Central Committee  
Date: 8/16/89

3 1 7 5 5 0 3 3 5 5 1 1  
This letter is to inform you that through a banking error your contribution of \$125 on 12/22/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89

*Jeffrey A. Smith*

From: Washington State Democratic Central Committee  
C00114439

Reference: Amended 30 Day Post-General Report (10/20/88-  
11/28/88) dated 6/20/89

Dear Mr. Averett:

The 30 Day Post Election Report you refer to was filed with your office on 6/6/89. A second copy is enclosed for your information. An up-dated Year End Report was filed at the same time. Additional amendments to both were filed on 8/8/89. Together the amended 30 Day Post Election Report and the amended Year End Report cover the period 10/20/88-12/31/88.

Regarding the Schedule A for Line 11(a)(1) and Line 11(b) you will find they were included with our 30 Day Post Election Report filed on 6/6/89. They are also included in the copy of that report enclosed.

The contributions you note in your letter of 8/8/89 were not eligible for use in federal campaigns. All were deposited due to a bookkeeping error in our federal account. Please note the following:

- 1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.
- 2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.
- 3) All these contributions have been properly reported to the state Public Disclosure Commission.
- 4) Copies of letters informing the original contributors of this transfer are enclosed.

Should you have further questions contact us at (206) 563-0664.

**HAND DELIVERED**

85 AUG 22 AM 10:49

RECEIVED



WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE

FEDERAL ACCOUNT  
1701 SMITH TOWER BLD. 2ND-503-0004  
SEATTLE, WA 98101

2084

6/17 1987

PAY  
TO THE  
ORDER OF

*Washington State Democratic Central Committee - State Account* \$ 6,000.00

*Bill Thompson* DOLLARS



FOR DEPOSIT ONLY

*Jeffrey A. Smith*

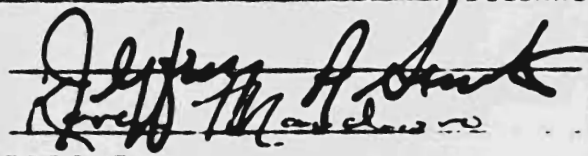
#002084# 61250005740 256 0963 80

9 1 4 0 8 6 5 0 0 1  
3 7 5 0 8 0 7 3

to: The Boeing Company  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$2,500 on 10/31/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

3 0 0 3 6 0 3 0 7 7 ;

<b>WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE</b>		<b>2085</b>
FEDERAL ACCOUNT 1701 SMITH TOWER PH. 206-466-0004 SEATTLE, WA 98101		
DATE <u>5/23</u> 19 <u>89</u>		18-87
TO THE ORDER OF <u>W/ R C</u>		\$ 4000.00
<u>James Howard</u>		DOLLARS
		
FOR DEPOSIT ONLY		
FOR CREDIT OF <u>Account of credit and to federal</u>		
received in <u>full</u>		
⑆002085⑆ ⑆125000574⑆ 256 0963 8⑆		

91040865003  
3736780791

Page 45 of 48

To: DeJarnett Senate Campaign  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$50 on 10/21/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.

3 7 3 6 3 3 0 7 7 7

to: Max Vekich Campaign Fund  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error your contribution of \$100 on 11/4/88 was deposited in our federal account instead of our state and local account. This contribution has been properly reported to the Public Disclosure Commission. If you have any questions, please contact this office at (206) 583-0664.



WASH. STATE DEMOCRATIC  
CENTRAL COMMITTEE

WASH. STATE DEMOCRATIC  
CENTRAL COMMITTEE

Page 47 of 48

To: Committee to Re-Elect Dennis Dellwo  
From: Washington State Democratic Central Committee  
Date: 8/16/89

This letter is to inform you that through a banking error  
your contribution of \$100 on 11/6/88 was deposited in our  
federal account instead of our state and local account. This  
contribution has been properly reported to the Public Disclosure  
Commission. If you have any questions, please contact this  
office at (206) 583-0664.

31948806570706

To: Donald Averett  
Reports Analysis Division  
Federal Elections Commission

8/21/89

From: Washington State Democratic Central Committee  
C00114439

Reference: Amended Year End Report (11/29/88-12/31/88)  
dated 6/20/89

Dear Mr. Averett:

On 6/6/89 we filed a 30-day Post-Election Report covering the period from 10/20/88-11/28/88. At that time we also filed a Year-End Report covering the period of 11/29/88-12/31/88. Together the two reports covered the period of 10/20/88-12/31/88. The amendments filed on 6/20/89 are referring only to the Year-End Report filed which covered 11/29/88-12/31/88 and did not affect the 30-Day Post-Election report. Another copy of the 30-Day Post-Election Report is enclosed.

The contributions listed in your letter of 8/8/89 were not eligible for use in federal campaigns. All were deposited due to a bookkeeping error in our federal account. Please note the following:

1) In no case were ineligible funds used for a federal campaign. All such funds deposited during 1988 total less than aid given to state candidates from this account in 1988.

2) We have written checks to transfer all such funds from our federal account to our state account. A copy of the check including the amounts in question is attached.

3) All these contributions have been properly reported to the state Public Disclosure Commission.

4) Copies of letters informing the original contributors of this transfer are enclosed.

Should you have further questions contact us at (206) 583-0664.

89 AUG 22 14:10:49  
HAND DELIVERED



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

RQ-2

DEC 20 1988

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

Identification Number: C00114439

Reference: April Quarterly (1/1/88-3/31/88), Amended 12 Day Pre-General (10/1/88-10/19/88, dated 8/21/89), Amended 30 Day Post-General (10/20/88-11/28/88, dated 6/20/89) and Year End (10/20/88-12/31/88) Reports

Dear Mr. Bleck:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your April Quarterly Report (1/1/88-3/31/88), Amended 12 Day Pre-General Report (10/1/88-10/19/88, dated 8/21/89) and Year End Report (10/20/88-12/31/88) pertinent portions attached) disclose contributions from organizations which are not political committees registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To

9904306868681

the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

-Schedule A of your Amended 30 Day Post-General Report (10/20/88-11/28/88, dated 6/20/89) (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) and 11 CFR 110.1(d))

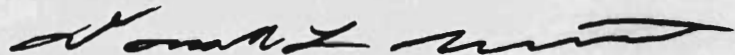
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$5,000 or, if appropriate, seek reattribution of the contribution pursuant to 11 CFR 110.1(k). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests. (11 CFR 103.3(b) and 110.1(k))

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In the best interests of the committee, all refunds, reattributions and transfers-out should be made within sixty days of the treasurer's receipt of the contribution. See 11 CFR 103.3(b). Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made. Reattributions are reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received.

Although the Commission may take further legal steps regarding the acceptance of an excessive contribution(s), prompt action by you to refund, seek reattribution and/or transfer-out the excessive amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Donald L. Averett  
Reports Analyst  
Reports Analysis Division

99043680105



Donald L. Averett, Reports Analyst  
Reports Analyst Division  
Federal Election Commission  
Washington, D.C. 20463

90 JAN 17 AM 10:49

Identification Number: C00114439

Reference: Your letter of 12/20/89

Dear Mr. Averett:

We have reviewed the contributions questioned in your letter of 12/20/89. An itemization of our response follows:

1) Schedule A of our Amended 30 Day Post-General Report (10/20/88-11/28/88, dated 6/20/89): you observe that a \$2,500 contribution from the Committee on Letter Carriers Political Education received by us on 11/10/88 appears to be in excess of the amount allowed because a contribution of \$5,000 was accepted on 8/11/88 from the same committee. This check was deposited in error in our federal account instead of our state and local account. This error has already been noted by us and corrected on June 23, 1989 when funds were transferred to our state account ( see attached copy of check #2085).

2) Schedule A of our April Quarterly Report (1/1/88-3/31/88), Amended 12 Day Pre-General Report (10/1/88-10/19/88, dated 8/21/89) and Year End Report (10/20/88-12/31/88): You noted several contributions which do not appear to be from permissible sources.

a) The contributions from CWA District 7 PAC (\$550) and Areospace Machinists #751 (\$1,000) were deposited in error in our federal account and have been transferred to our state account (see attached copy of check #2285).

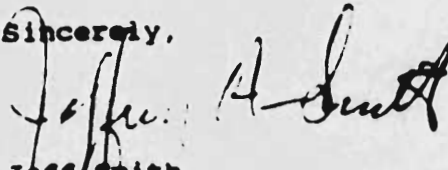
b) The contributions from the Kitsap County Democrats, 41st District Democrats, 4th District Democrats, and Mason County Democrats (totalling \$1,750) are from local affiliates of the Washington State Democratic Central Committee. We believe it would be possible to demonstrate that these funds came from individual contributors and thus are permissible. So that there will be no question, however,

*all* [ we have transferred the \$1,750 from our federal to our state account (see attached copy of check #2285).

3) Please note that funds are expended from our federal account for state and local as well as federal elections. Regardless of this fact, we have transferred all questioned funds from our federal account to our state account so that there can be no question of our compliance.

Should you have any further questions, please do not hesitate to contact me.

Sincerely,



Jeff Smith  
Executive Director

91040865012

WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE

FEDERAL ACCOUNT

1701 SMITH TOWER PH. 206-583-0804  
SEATTLE, WA 98104

2085

PAY  
TO THE  
ORDER OF

*W. H. C.*

*6/23 10:54 12:07*

*\$ 4000.00*

*Four thousand 00*

DOLLARS



*Jeffrey A. Smith*

FOR CREDIT OF *Special Fund to Federal*  
*Account in name*

⑆002085⑆ ⑆125000574⑆ 256 0963 8⑆

WASHINGTON STATE DEMOCRATIC  
CENTRAL COMMITTEE

FEDERAL ACCOUNT

1701 SMITH TOWER PH. 206-583-0664  
SEATTLE, WA 98104

2285

19-57/1250

PAY  
TO THE  
ORDER OF

WSDCC

119 19 90

\$ 3300.00

Three thousand three hundred <sup>00</sup>/<sub>100</sub>

DOLLARS



Key Bank of Puget Sound  
Pioneer Square Office  
119 First Ave. S., #120  
Seattle, WA 98104

FOR

transfer to state account

*[Signature]*  
*[Signature]*

⑈002285⑈ ⑆125000574⑆ 256 0963 8⑈

## ITEMIZED DISBURSEMENTS

 Use separate schedule(s)  
for each category of the  
Detailed Summary Page

 PAGE OF  
1 1 1  
FOR LINE NUMBER  
20

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (in Full)

Washington State Democratic Central Committee

A. Full Name, Mailing Address and ZIP Code WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE - STATE & LOCAL ACCOUNT 1701 SMITH TOWER SEATTLE, WA 98104	Purpose of Disbursement TRANSFER OF FUNDS DEPOSITED IN ERROR Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 4/7/89	Amount of Each Disbursement This Period 8200.00
B. Full Name, Mailing Address and ZIP Code SAME AS ABOVE	Purpose of Disbursement SAME AS ABOVE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/9/89	Amount of Each Disbursement This Period 75.00
C. Full Name, Mailing Address and ZIP Code SAME AS ABOVE	Purpose of Disbursement SAME AS ABOVE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 6/19/89	Amount of Each Disbursement This Period 6000.00
D. Full Name, Mailing Address and ZIP Code SAME AS ABOVE	Purpose of Disbursement SAME AS ABOVE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 6/23/89	Amount of Each Disbursement This Period 4000.00
E. Full Name, Mailing Address and ZIP Code SAME AS ABOVE	Purpose of Disbursement SAME AS ABOVE Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 6/30/89	Amount of Each Disbursement This Period 2700.00
F. Full Name, Mailing Address and ZIP Code WYOMING DEMOCRATIC PARTY BOX 1464 CASPER, WY 82602	Purpose of Disbursement CONTRIBUTION Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 4/14/89	Amount of Each Disbursement This Period 5000.00
G. Full Name, Mailing Address and ZIP Code WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE 1701 SMITH TOWER SEATTLE, WA 98104	Purpose of Disbursement TRANSFER TO STATE ACCOUNT Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 5/2/89	Amount of Each Disbursement This Period 2.99
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

25,977.99



**1989 YEAR END REPORT  
ITEMIZED DISBURSEMENTS**

Page 2 of 2

Associate schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 1 OF 1  
FOR LINE NUMBER 20

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

**WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE**

<b>A. Full Name, Mailing Address and ZIP Code</b> WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE 1701 SMITH TOWER SEATTLE, WA 98104	<b>Purpose of Disbursement</b> TRANSFER OF FUNDS DEPOSITED IN ERROR Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 7/20/89	<b>Amount of Each Disbursement This Period</b> 1000.00
<b>B. Full Name, Mailing Address and ZIP Code</b> SAME	<b>Purpose of Disbursement</b> SAME Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 8/15/89	<b>Amount of Each Disbursement This Period</b> 125.00
<b>C. Full Name, Mailing Address and ZIP Code</b> DEMOCRATIC NATIONAL COMMITTEE 430 S. CAPITOL SE WASHINGTON, DC 20006	<b>Purpose of Disbursement</b> TRANSFER Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 10/10/89	<b>Amount of Each Disbursement This Period</b> 5,000.00
<b>D. Full Name, Mailing Address and ZIP Code</b> WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE 1701 SMITH TOWER SEATTLE, WA 98104	<b>Purpose of Disbursement</b> TRANSFER OF FUNDS DEPOSITED IN ERROR Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b> 11/20/89	<b>Amount of Each Disbursement This Period</b> 25.00
<b>E. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>F. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>G. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>H. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>
<b>I. Full Name, Mailing Address and ZIP Code</b>	<b>Purpose of Disbursement</b> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Date (month, day, year)</b>	<b>Amount of Each Disbursement This Period</b>

SUBTOTAL of Disbursements This Page (optional)

6150.00

TOTAL This Period (last page this line number only)

6150.00

9100403865067

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463

**FIRST GENERAL COUNSEL'S REPORT**

RAD Referral # 90L-18  
Staff Member: Lawrence D. Parris

SOURCE: I N T E R N A L L Y G E N E R A T E D

RESPONDENTS: Washington State Democratic Committee and Clay  
Bleck, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 441b  
11 C.F.R. § 102.5(a)(1)  
11 C.F.R. § 102.5(a)(2)  
11 C.F.R. § 103.3(b)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD"). (Attachment 1). The referral concerns possible violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by the Washington State Democratic Central Committee (the "Committee"), and Clay Bleck, as treasurer, which resulted from the Committee's deposit of apparent impermissible contributions into its separate account maintained to finance political activity in connection with federal elections. The Committee received a total of \$7,775, apparent impermissible funds from seven (7) corporations, and \$14,667.87, apparent impermissible funds from thirty-three (33) unregistered organizations during 1988. The Committee transferred the entire amount of the apparent impermissible funds to its non-federal account more than thirty (30) days after receipt thereof.

90 AUG -1 PM 4:34

RECEIVED  
FEDERAL ELECTION COMMISSION  
STAFF REPORT

91040865017

## II. FACTUAL AND LEGAL ANALYSIS

### A. Receipts from Unregistered Organization

Under 11 C.F.R. § 102.5(a)(1)(i), organizations that are political committees under the Act which finance political activity in connection with both federal and non-federal elections and have established a separate federal account, such account shall be treated as a separate federal committee. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections.

Pursuant to 11 C.F.R. § 102.5(a)(2), contributions that are deposited into an account that finances federal activity must meet three conditions: (1) the contribution must be designated for the federal account; (2) the solicitation must expressly state that the contribution will be used in connection with a federal election; and, (3) the contributors must be informed that all contributions are subject to the limitations and prohibitions of the Act.

Pursuant to 11 C.F.R. § 103.3(b), the treasurer of a committee is responsible for examining all contributions received for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions, exceed the contribution limitations. When contributions received present genuine questions as to whether

91040865018

they were made by corporations, labor organizations, foreign nationals, or Federal contractors, within ten days of receipt, the treasurer can deposit the funds into a campaign depository or return them to the contributor. If any such contribution is deposited, the treasurer shall make at least one written or oral request for evidence of the legality of the contribution. If the contribution cannot be determined to be legal, the treasurer shall within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

11 C.F.R. § 103.3(b)(1). However, if the treasurer determined at the time the contribution was received that it was not illegal, but later discovers its illegality based on new evidence not available to the committee at the time of receipt or deposit, the treasurer shall refund the contribution within thirty days of discovering its illegality. 11 C.F.R. § 103.3(b)(2).

RAD's review of the Committee's 1988 Year End Report disclosed receipts totaling \$14,667.87 from thirty-three (33) unregistered organizations:

<u>CONTRIBUTOR</u>	<u>AMOUNT/</u>	<u>RECEIVED/</u>	<u>DATE TRANSFERRED</u>
Project 500 <sup>1</sup>	\$5,000.00	11/07/88	04/07/89
Washington Education Association	750.00	12/02/88	04/07/89
Washington State Labor	250.00	12/02/88	04/07/89

1. \*A Registration Notice and Second Letter were sent to Project 500 on March 16 and April 6, 1989. A response was received May 3, 1989 which stated that the contribution was intended to be used for state election activity. It should be noted that Project 500 is located in Washington, DC, which does permit labor union contributions.

91040865019



Council-PPP Committee	500.00	10/13/88	** <sup>2</sup>
Public Employees Action Committee	200.00	12/12/88	04/07/89
People for Ken Jacobsen	50.00	02/04/88	**
Robert Basich Campaign	25.00	01/07/88	**
The Royer Committee	25.00	03/29/88	**
	125.00	12/02/88	**
Democratic Majority Committee	489.88	03/23/88	**
June Leonard Campaign	50.00	05/26/88	**
Committee for Ernest Crane	100.00	05/26/88	**
Committee to Elect Wayne Ehlers	100.00	05/26/88	**
Frank Warnke Campaign Fund	50.00	06/09/88	**
Citizens to Elect George D. Masten	65.00	06/09/88	**
Committee for Delores Sibonga	50.00	08/12/88	**
Marlin Applewick Election Committee	500.00	10/03/88	**
People for Joe King	500.00	10/03/88	**
Committee to Elect Marc Gaspard	500.00	10/13/88	**
Committee to Elect Art Wang	750.00	10/13/88	**
	250.00	10/13/88	**
LAWPAC	250.00	10/13/88	**
Committee for Brian Ebersole	250.00	10/13/88	**
Northshore Education Assoc. (NSEA-PAC)	500.00	10/13/88	**

2. \*\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/23/89 or 07/20/89.



Bev Goodman Committee	387.99	10/13/88	**
Dejarnett Senate Campaign	50.00	10/21/88	**
Max Vekich Campaign Fund	100.00	11/04/88	**
Committee to Re-Elect Dennis Dellwo	100.00	11/06/88	**
Re-Election Committee for Paul Conner	125.00	12/12/88	**
Committee to Elect Cal Anderson	125.00	12/12/88	**
Kitsap County Democrats	100.00	02/15/88	01/09/90*** <sup>3</sup>
41st District Democrats	50.00	03/01/88	01/09/90***
CWA District 7 PEC	550.00	10/03/88	01/09/90***
4th District Democrats	1,100.00	10/13/88	01/09/90***
Mason County Democrats	500.00	11/02/88	01/09/90***
46 Electrical Workers Pac	<u>150.00</u>	11/07/88 <sup>4</sup>	

Total \$14,667.87

A RFAI was sent to the Committee on March 29, 1989, inquiring about the receipt of contributions from unregistered organizations and a labor organization. The RFAI requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the

3. \*\*\*The Committee stated that it believed that it would be possible to demonstrate that these contributions were permissible but that it was transferring them out "[s]o that there will be no question...".

4. Review of the Committee's amended 30 Day Post-General Report disclosed the receipt of an additional \$150 apparent impermissible contribution from an unregistered organization. The Committee has not been notified of this apparent impermissible contribution nor has the Committee refunded it or transferred it out.

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donor's consent, transfer out any impermissible funds. On April 10, 1989, the Commission received a response from the Committee via letter, which indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check dated April 7, 1989 transferring the full amount to its non-federal account, and copies of letters to each of the contributing organizations was enclosed with the letter.

On June 21, 1989 the Commission received amendments for all 1988 reports except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions, which had not previously been disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, RFAIs were sent to the Committee for all amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports requesting additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer out any impermissible funds.

On August 22, 1989, the Commission received a response which indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks dated June 19, June 23, June 30 and July 20 1989, transferring the amounts to its non-federal account. The response also included copies of letters to each of the contributing organizations. The letters advised the

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organizations that the contributions had been mistakenly deposited in the Committee's federal account and that they were now being transferred to the State and Local account.

Upon further review of information provided by the Committee, additional apparent impermissible receipts were discovered. On December 20, 1989, a RFAI was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization. The RFAI requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer-out any impermissible funds.

On January 17, 1990 the Commission received a response which indicated that a portion of the apparent impermissible contributions had been mistakenly deposited in the federal account. The response indicated that the remainder of the apparent impermissible contributions were received from local party organizations and that the Committee believed them to be permissible contributions but transferred them out so that there would be no questions. The response also included a copy of a check dated January 9, 1990 transferring the full amount to its non-federal account.

The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

Washington State law permits corporations and labor unions

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to make contributions or expenditures to State political committees. Therefore, it appears that Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by accepting contributions from unregistered organizations which appear not to be subject to the prohibitions and limitations of the Act, and depositing such contributions into their federal account.

**B. Receipt of Apparent Prohibited Funds**

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation or labor union to make a contribution or expenditure in connection with a federal election, or a candidate or political committee to accept such a contribution.

RAD's review of the Committee's 1988 Year End Report disclosed receipts totaling \$7,775, from seven (7) corporations and labor organizations:

<u>CONTRIBUTOR</u>	<u>AMOUNT/</u>	<u>RECEIVED/</u>	<u>DATE TRANSFERRED</u>
International longshoreman's Local 19	\$2,000	11/07/88	04/07/89
Washington State Employees Local 504	25	06/13/88	* <sup>5</sup>
Edmonds Education Assoc.	2,000	10/13/88	*
The Boeing Company	2,500	10/31/88	*
Ron Dotzauer and Associates, Inc.	125	12/12/88	*
United Transportation Union	125	12/22/88	*
Aerospace Machinists #751	1,000	10/03/88	*
Total	<u>\$7,775</u>		

5. \*These contribution appear to have been transferred out on checks dated either 06/19/89, 06/23/89, 06/30/89 or 07/20/89.

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The RFAI sent to the Committee on March 29, 1989, also gave reference to the receipt of contributions from unregistered organizations and a labor organization. The RFAI requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donor's consent, transfer out any impermissible funds. The April 10, 1989, response from the Committee, via letter, indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check dated April 7, 1989 transferring the full amount to its non-federal account, and a copy of the letter to the labor organization was enclosed with the letter.

As noted above, on June 21, 1989, the Commission received the amendments for the 1988 reports, except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions not previously disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, RFAs were sent to the Committee for all the amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports.

Also noted above, the August 22, 1989 response indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks dated June 19, June 23, June 30 and

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July 20 1989 transferring the amounts to its non-federal account and also included copies of letters to each of the contributing organizations.

On December 20, 1989, an RFAI was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization.

As previously mentioned, the January 17, 1990 response indicated that a portion of the apparent impermissible contributions had been mistakenly deposited into the federal account. The response indicated that the remainder of the apparent impermissible contributions were received from local party organizations. The Committee believed them to be permissible contributions but nevertheless, transferred them out so that there would be no questions. The response also included a copy of a check dated January 9, 1990, transferring the full amount to its non-federal account.

The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

Based upon the foregoing, it appears that Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and, 11 C.F.R. § 102.5(a) by accepting contribution from corporations and labor organizations and depositing such contributions into their federal account.

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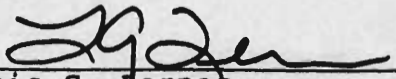
**III. RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe the Washington State Democratic and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).
3. Approve the attached Factual and Legal Analysis, and appropriate letters.

Lawrence M. Noble  
General Counsel

Date 8/1/90

BY:

  
Lois G. Berner  
Associate General Counsel

**Attachments**

1. Referral Materials
2. Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *OK*  
COMMISSION SECRETARY

DATE: AUGUST 7, 1990

SUBJECT: RAD REFERRAL 90L-18 - 1st GENERAL COUNSEL'S REPORT  
DATED AUGUST 1, 1990

The above-captioned document was circulated to the  
Commission on Thursday, August 2, 1990 at 11:00 a.m..

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda  
for Tuesday, August 14, 1990.

Please notify us who will represent your Division before the  
Commission on this matter.

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION

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MEMORANDUM - AUGUST 8, 1990

TO: MARJORIE EMMONS,  
Commission Secretary

FROM: COMMISSIONER THOMAS J. JOSEFIK

RE: Rad Referral 90L-18

On August 6, 1990 I voted to object to the General Counsel's Recommendations in RAD REFERRAL #90L-18, dated August 1, 1990.

I wish to withdraw my objection and be recorded as approving the General Counsel's Recommendations.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Washington State Democratic Committee  
and Clay Bleck, as treasurer.

)  
) RAD Referral #90L-18  
)  
)

(MUR)  
3106

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 8, 1990, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral #90L-18:

1. Open a MUR.
2. Find reason to believe the Washington State Democratic and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).
3. Approve the Factual and Legal Analysis, and letters, as recommended in the General Counsel's Report dated August 1, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

8-8-90

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat:	Wednesday, Aug. 1, 1990	4:34 p.m.
Circulated to the Commission:	Thursday, Aug. 2, 1990	11:00 a.m.
Deadline for vote:	Monday, Aug. 6, 1990	11:00 a.m.
Objection received:	Monday, Aug. 6, 1990	4:24 p.m.
Objection withdrawn:	Wednesday, Aug. 8, 1990	10:22 a.m.

dh

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 14, 1990

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

RE: MUR 3106  
Washington State Democratic  
Central Committee and  
Clay Bleck, as treasurer

Dear Mr. Bleck:

On August 8, 1990, the Federal Election Commission found that there is reason to believe Washington State Democratic Central Committee and you, as treasurer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and the Federal regulations at 11 C.F.R. § 102.5(a). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time

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Clay Bleck, Treasurer  
Page 2

so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

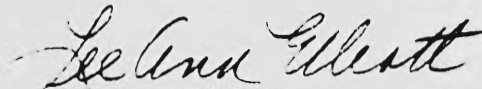
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

  
Lee A. Elliott  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form

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**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

Respondents: Washington State Democratic Committee      MUR: 3106  
and Clay Bleck, as treasurer

**I.    GENERATION OF MATTER**

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2).

**II.   FACTUAL AND LEGAL ANALYSIS**

**A.   Receipts from Unregistered Organization**

Under 11 C.F.R. § 102.5(a)(1)(i), organizations that are political committees under the Act which finance political activity in connection with both federal and non-federal elections and have established a separate federal account, such account shall be treated as a separate federal committee. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account. No transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections.

Pursuant to 11 C.F.R. § 102.5(a)(2), contributions that are deposited into an account that finances federal activity must meet three conditions: (1) the contribution must be designated for the federal account; (2) the solicitation must expressly state that the contribution will be used in connection with a

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federal election; and, (3) the contributors must be informed that all contributions are subject to the limitations and prohibitions of the Act.

Pursuant to 11 C.F.R. § 103.3(b), the treasurer of a committee is responsible for examining all contributions received for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions, exceed the contribution limitations. When contributions received present genuine questions as to whether they were made by corporations, labor organizations, foreign nationals, or Federal contractors, within ten days of receipt, the treasurer can deposit the funds into a campaign depository or return them to the contributor. If any such contribution is deposited, the treasurer shall make at least one written or oral request for evidence of the legality of the contribution. If the contribution cannot be determined to be legal, the treasurer shall within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor. 11 C.F.R. § 103.3(b)(1). However, if the treasurer determined at the time the contribution was received that it was not illegal, but later discovers its illegality based on new evidence not available to the committee at the time of receipt or deposit, the treasurer shall refund the contribution within thirty days of discovering its illegality. 11 C.F.R. § 103.3(b)(2).

A review of the Committee's 1988 Year End Report disclosed receipts totaling \$14,667.87 from thirty-three (33) unregistered

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organizations:

<u>CONTRIBUTOR</u>	<u>AMOUNT/</u>	<u>RECEIVED/</u>	<u>DATE TRANSFERRED</u>
Project 500 <sup>1</sup>	\$5,000.00	11/07/88	04/07/89
Washington Education Association	750.00	12/02/88	04/07/89
Washington State Labor Council-PPP Committee	250.00 500.00	12/02/88 10/13/88	04/07/89 ** <sup>2</sup>
Public Employees Action Committee	200.00	12/12/88	04/07/89
People for Ken Jacobsen	50.00	02/04/88	**
Robert Basics Campaign	25.00	01/07/88	**
The Royer Committee	25.00 125.00	03/29/88 12/02/88	** **
Democratic Majority Committee	489.88	03/23/88	**
June Leonard Campaign	50.00	05/26/88	**
Committee for Ernest Crane	100.00	05/26/88	**
Committee to Elect Wayne Ehlers	100.00	05/26/88	**
Frank Warnke Campaign Fund	50.00	06/09/88	**
Citizens to Elect George D. Masten	65.00	06/09/88	**
Committee for Delores Sibonga	50.00	08/12/88	**
Marlin Applewick Election Committee	500.00	10/03/88	**
People for Joe King	500.00	10/03/88	**
Committee to Elect Marc Gaspard	500.00	10/13/88	**

1. \*It should be noted that Project 500 is located in Washington, DC, which does permit labor union contributions.

2. \*\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/23/89 or 07/20/89.

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Committee to Elect Art Wang	750.00	10/13/88	**
	250.00	10/13/88	**
LAWPAC	250.00	10/13/88	**
Committee for Brian Ebersole	250.00	10/13/88	**
Northshore Education Assoc. (NSEA-PAC)	500.00	10/13/88	**
Bev Goodman Committee	387.99	10/13/88	**
Dejarnett Senate Campaign	50.00	10/21/88	**
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Re-Election Committee for Paul Conner	125.00	12/12/88	**
Committee to Elect Cal Anderson	125.00	12/12/88	**
Kitsap County Democrats	100.00	02/15/88	01/09/90*** <sup>3</sup>
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CWA District 7 PEC	550.00	10/03/88	01/09/90***
4th District Democrats	1,100.00	10/13/88	01/09/90***
Mason County Democrats	500.00	11/02/88	01/09/90***
46 Electrical Workers Pac	<u>150.00</u>	11/07/88 <sup>4</sup>	
Total \$14,667.87			

3. \*\*\*The Committee stated that it believed that it would be possible to demonstrate that these contributions were permissible but that it was transferring them out "[s]o that there will be no question...".

4. Review of the Committee's amended 30 Day Post-General Report disclosed the receipt of an additional \$150 apparent impermissible contribution from an unregistered organization. The Committee has not been notified of this apparent impermissible contribution nor has the Committee refunded it or transferred it out.

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A letter was sent to the Committee on March 29, 1989, inquiring about the receipt of contributions from unregistered organizations and a labor organization. The letter requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donor's consent, transfer out any impermissible funds. On April 10, 1989, the Commission received a response from the Committee via letter, which indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check dated April 7, 1989 transferring the full amount to its non-federal account, and copies of letters to each of the contributing organizations was enclosed with the letter.

On June 21, 1989 the Commission received amendments for all 1988 reports except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions, which had not previously been disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, letters were sent to the Committee for all amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports requesting additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer out any impermissible funds.

On August 22, 1989, the Commission received a response

which indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks dated June 19, June 23, June 30 and July 20 1989, transferring the amounts to its non-federal account. The response also included copies of letters to each of the contributing organizations. The letters advised the organizations that the contributions had been mistakenly deposited in the Committee's federal account and that they were now being transferred to the State and Local account.

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Upon further review of information provided by the Committee, additional apparent impermissible receipts were discovered. On December 20, 1989, a letter was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization. The letter requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donors' consent, transfer-out any impermissible funds.

On January 17, 1990 the Commission received a response which indicated that a portion of the apparent impermissible contributions had been mistakenly deposited in the federal account. The response indicated that the remainder of the apparent impermissible contributions were received from local party organizations and that the Committee believed them to be permissible contributions but transferred them out so that there would be no questions. The response also included a copy

of a check dated January 9, 1990 transferring the full amount to its non-federal account.

The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

Washington State law permits corporations and labor unions to make contributions or expenditures to State political committees. Therefore, it appears that Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by accepting contributions from unregistered organizations which appear not to be subject to the prohibitions and limitations of the Act, and depositing such contributions into their federal account.

**B. Receipt of Apparent Prohibited Funds**

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation or labor union to make a contribution or expenditure in connection with a federal election, or a candidate or political committee to accept such a contribution.

A review of the Committee's 1988 Year End Report disclosed receipts totaling \$7,775, from seven (7) corporations and labor organizations:

<u>CONTRIBUTOR</u>	AMOUNT/	RECEIVED/	DATE TRANSFERRED
International longshoremen's Local 19	\$2,000	11/07/88	04/07/89
Washington State Employees			

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Local 504	25	06/13/88	* <sup>5</sup>
Edmonds Education Assoc.	2,000	10/13/88	*
The Boeing Company	2,500	10/31/88	*
Ron Dotzauer and Associates, Inc.	125	12/12/88	*
United Transportation Union	125	12/22/88	*
Aerospace Machinists #751	1,000	10/03/88	*
Total	\$7,775		

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The letter sent to the Committee on March 29, 1989, also gave reference to the receipt of contributions from unregistered organizations and a labor organization. The letter requested additional information to clarify whether the contributions were permissible and advised the Committee to refund or, with the donor's consent, transfer out any impermissible funds. The April 10, 1989, response from the Committee, via letter, indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check dated April 7, 1989 transferring the full amount to its non-federal account, and a copy of the letter to the labor organization was enclosed with the letter.

As noted above, on June 21, 1989, the Commission received the amendments for the 1988 reports, except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions not

5. \*These contribution appear to have been transferred out on checks dated either 06/19/89, 06/23/89, 06/30/89 or 07/20/89.



previously disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, letters were sent to the Committee for all the amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports.

Also noted above, the August 22, 1989 response indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks dated June 19, June 23, June 30 and July 20 1989 transferring the amounts to its non-federal account and also included copies of letters to each of the contributing organizations.

On December 20, 1989, an letter was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization.

As previously mentioned, the January 17, 1990 response indicated that a portion of the apparent impermissible contributions had been mistakenly deposited into the federal account. The response indicated that the remainder of the apparent impermissible contributions were received from local party organizations. The Committee believed them to be permissible contributions but nevertheless, transferred them out so that there would be no questions. The response also included a copy of a check dated January 9, 1990, transferring the full amount to its non-federal account.

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The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

Therefore, there is reason to believe that the Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a) by accepting prohibited contributions.

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WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO  
STATE CHAIR

JEFF SMITH  
EXECUTIVE DIRECTOR

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RECEIVED  
FEDERAL ELECTION COMMISSION

September 4, 1990

Lee A. Elliott  
Chairman  
Federal Election Commission  
999 E Street  
Washington, D.C. 20463

RE: MUR 3106  
Washington State  
Democratic Central  
Committee and Clay  
Bleck, Treasurer

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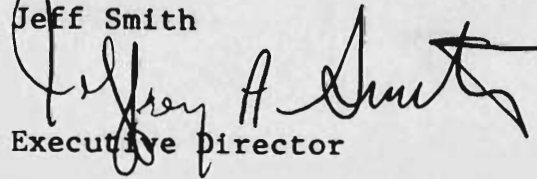
RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICIAL ELECTION COUNSEL

Dear Mr. Elliott:

The Washington State Democratic Central Committee  
would like to pursue pre-probable cause conciliation  
with respect to MUR 3106.

Sincerely yours,

Clay Bleck, Treasurer  
Jeff Smith

  
Executive Director

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Washington State Democratic )  
Central Committee and Clay Bleck, )  
as treasurer )  
)

MUR 3106 **SENSITIVE**

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD"). (Attachment 1). The referral concerned possible violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by the Washington State Democratic Central Committee (the "Committee"), and Clay Bleck, as treasurer, which resulted from the Committee's deposit of apparent impermissible contributions into its separate account maintained to finance political activity in connection with federal elections. The Committee received a total of \$7,775, apparent impermissible funds from seven (7) corporations, and \$14,667.87, apparent impermissible funds from thirty-three (33) unregistered organizations during 1988. The Committee transferred the entire amount of these funds to its non-federal account more than thirty (30) days after receipt thereof.

On August 8, 1990, the Commission found reason to believe the Washington State Democratic Central Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).

On September 11, 1990, the Commission received a request

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from the Committee, dated September 4, 1990, to pursue preprobable cause conciliation. (Attachment 1). On September 13, 1990, staff from the Office of General Counsel's office also met with Jeffrey Smith, Executive Director of the Washington State Democratic Central Committee.

## II. ANALYSIS

### A. Receipts from Unregistered Organizations

Under 11 C.F.R. § 102.5(a)(1)(i), organizations that are political committees under the Act which finance political activity in connection with both federal and non-federal elections and have established a separate federal account, such account shall be treated as a separate federal committee. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account.

Pursuant to 11 C.F.R. § 102.5(a)(2), contributions that are deposited into an account that finances federal activity must meet three conditions: (1) the contribution must be designated for the federal account; (2) the solicitation must expressly state that the contribution will be used in connection with a federal election; and, (3) the contributors must be informed that all contributions are subject to the limitations and prohibitions of the Act.

Pursuant to 11 C.F.R. § 103.3(b), the treasurer of a committee is responsible for examining all contributions received for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions, exceed the contribution limitations.

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RAD's review of the Committee's 1988 Year End Report disclosed receipts totaling \$14,667.87 from thirty-three (33) unregistered organizations:

CONTRIBUTOR	AMOUNT/	RECEIVED/	DATE TRANSFERRED
Project 500 <sup>1</sup>	\$5,000.00	11/07/88	04/07/89
Washington Education Association	750.00	12/02/88	04/07/89
Washington State Labor Council-PPP Committee	250.00 500.00	12/02/88 10/13/88	04/07/89 ** <sup>2</sup>
Public Employees Action Committee	200.00	12/12/88	04/07/89
People for Ken Jacobsen	50.00	02/04/88	**
Robert Basich Campaign	25.00	01/07/88	**
The Royer Committee	25.00 125.00	03/29/88 12/02/88	** **
Democratic Majority Committee	489.88	03/23/88	**
June Leonard Campaign	50.00	05/26/88	**
Committee for Ernest Crane	100.00	05/26/88	**
Committee to Elect Wayne Ehlers	100.00	05/26/88	**
Frank Warnke Campaign Fund	50.00	06/09/88	**
Citizens to Elect George D. Masten	65.00	06/09/88	**
Committee for Delores Sibonga	50.00	08/12/88	**

1. \*A Registration Notice and Second Letter were sent to Project 500 on March 16 and April 6, 1989. A response was received May 3, 1989 which stated that the contribution was intended to be used for state election activity. It should be noted that Project 500 is located in Washington, DC, which does permit labor union contributions.

2. \*\*These contributions appear to have been transferred-out on checks dated either 06/19/89, 06/23/89 or 07/20/89.

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Marlin Applewick Election Committee	500.00	10/03/88	**
People for Joe King	500.00	10/03/88	**
Committee to Elect Marc Gaspard	500.00	10/13/88	**
Committee to Elect Art Wang	750.00	10/13/88	**
	250.00	10/13/88	**
LAWPAC	250.00	10/13/88	**
Committee for Brian Ebersole	250.00	10/13/88	**
Northshore Education Assoc. (NSEA-PAC)	500.00	10/13/88	**
Bev Goodman Committee	387.99	10/13/88	**
Dejarnett Senate Campaign	50.00	10/21/88	**
Max Vekich Campaign Fund	100.00	11/04/88	**
Committee to Re-Elect Dennis Dellwo	100.00	11/06/88	**
Re-Election Committee for Paul Conner	125.00	12/12/88	**
Committee to Elect Cal Anderson	125.00	12/12/88	**
Kitsap County Democrats	100.00	02/15/88	01/09/90*** <sup>3</sup>
41st District Democrats	50.00	03/01/88	01/09/90***
CWA District 7 PEC	550.00	10/03/88	01/09/90***
4th District Democrats	1,100.00	10/13/88	01/09/90***

3. \*\*\*The Committee stated that it believed that it would be possible to demonstrate that these contributions were permissible but that it was transferring them out "[s]o that there will be no question...". The Committee has not sought to provide such information in response to the reason to believe findings although staff of this office informed the Committee that this opportunity was still available to it.

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Mason County Democrats	500.00	11/02/88	01/09/90***
46 Electrical Workers PAC	<u>150.00</u>	11/07/88 <sup>4</sup>	

Total \$14,667.87

A RFAI was sent to the Committee on March 29, 1989 inquiring about the receipt of contributions from unregistered organizations and a labor organization. On April 10, 1989, the Commission received a response from the Committee via letter, which indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check, dated April 7, 1989, transferring the full amount to its non-federal account, and copies of letters to each of the contributing organizations, were enclosed with the letter.

On June 21, 1989, the Commission received amendments for all 1988 reports except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions, which had not previously been disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, RFAIs were sent to the Committee for all amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports.

4. Review of the Committee's amended 30 Day Post-General Report disclosed the receipt of an additional \$150 apparent impermissible contribution from an unregistered organization. The Committee had not been notified by RAD of this apparent impermissible contribution nor has the Committee refunded it or transferred it out. This contribution was included in the factual and legal analysis that accompanied the notification of the Commission's findings in this matter.

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On August 22, 1989, the Commission received a response which indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks, dated June 19, June 23, June 30 and July 20, 1989, transferring the amounts to its non-federal account. The response also included copies of letters to each of the contributing organizations. The letters advised the organizations that the contributions had been mistakenly deposited in the Committee's federal account and that they were now being transferred to the State and Local account.

Upon further review of information provided by the Committee, additional apparent impermissible receipts were discovered. On December 20, 1989, a RFAI was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization.

On January 17, 1990, the Commission received a response that indicated that the remainder of the apparent impermissible contributions were received from local party organizations and that the Committee believed them to be permissible contributions but transferred them out so that there would be no questions. The response also included a copy of a check, dated January 9, 1990, transferring the full amount to its non-federal account. The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

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Washington State law permits corporations and labor unions to make contributions or expenditures to State political committees.

Accordingly, the evidence that the Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a) by accepting contributions from unregistered organizations which appear not to be subject to the prohibitions and limitations of the Act and depositing such contributions into their federal account remains unchanged since the reason to believe findings.

**B. Receipt of Apparent Prohibited Funds**

Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation or labor union to make a contribution or expenditure in connection with a federal election, or a candidate or political committee to accept such a contribution.

RAD's review of the Committee's 1988 Year End Report disclosed receipts totaling \$7,775, from seven (7) corporations and labor organizations:

<u>CONTRIBUTOR</u>	<u>AMOUNT/</u>	<u>RECEIVED/</u>	<u>DATE TRANSFERRED</u>
International longshoremen's Local 19	\$2,000	11/07/88	04/07/89
Washington State Employees Local 504	25	06/13/88	* <sup>5</sup>
Edmonds Education Assoc.	2,000	10/13/88	*
The Boring Company	2,500	10/31/88	*
Ron Dotzauer and Associates, Inc.	125	12/12/88	*

5. \*These contribution appear to have been transferred out on checks dated either 06/19/89, 06/23/89, 06/30/89 or 07/20/89.

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United Transportation Union	125	12/22/88	*
Aerospace Machinists #751	1,000	10/03/88	*
Total	<u>\$7,775</u>		

The RFAI sent to the Committee on March 29, 1989 also gave reference to the receipt of contributions from unregistered organizations and a labor organization. The April 10, 1989 response from the Committee, via letter, indicated that the apparent impermissible contributions "were inadvertently deposited in our Federal Account due to a bookkeeping error." A copy of a check, dated April 7, 1989, transferring the full amount to its non-federal account, and a copy of the letter to the labor organization, were enclosed with the letter.

As noted above, on June 21, 1989, the Commission received the amendments for the 1988 reports, except the October Quarterly Report which indicated that the Committee had discovered additional improperly deposited contributions not previously disclosed. The amendments disclosed the receipt of contributions from corporations, labor organizations and unregistered organizations. On August 8, 1989, RFAIs were sent to the Committee for all the amended 1988 reports except for the October Quarterly and 30 Day Post-General Reports.

Also noted above, the August 22, 1989 response indicated that the apparent impermissible contributions had been mistakenly deposited in the federal account. The responses included copies of checks, dated June 19, June 23, June 30 and July 20 1989, transferring the amounts to its non-federal

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account and also included copies of letters to each of the contributing organizations.

On December 20, 1989, an RFAI was sent to the Committee for the April Quarterly, amended 12 Day Pre-General, 30 Day Post-General and Year End Reports inquiring about the receipt of contributions from unregistered organizations and a labor organization.

The 1989 Mid-Year and Year End Reports disclosed the transfers-out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

Accordingly, the evidence that the Washington State Democratic Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and, 11 C.F.R. § 102.5(a) by accepting contribution from corporations and labor organizations and depositing such contributions into their federal account also remains unchanged.

### III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

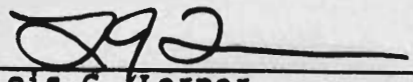
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IV. RECOMMENDATIONS

1. Enter into conciliation with the Washington State Democratic Central Committee and Clay Bleck, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and the appropriate letter.

Lawrence M. Noble  
General Counsel

Date 1/10/91

BY:   
Lois G. Lerner  
Associate General Counsel

Attachments

1. Request for conciliation
2. Proposed Conciliation Agreement

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FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE  
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / DONNA ROACH *DR*  
COMMISSION SECRETARY

DATE: JANUARY 15, 1991

SUBJECT: MUR 3106 - GENERAL COUNSEL'S REPORT  
DATED JANUARY 10, 1991

The above-captioned document was circulated to the  
Commission on Friday, January 11, 1991 at 2:00 p.m..

Objection(s) have been received from the Commissioner(s)  
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	XXXX
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda  
for TUESDAY, JANUARY 29, 1991.

Please notify us who will represent your Division before the  
Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 3106  
Washington State Democratic Central )  
Committee and Clay Bleck, as )  
treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session on  
January 29, 1991, do hereby certify that the Commission  
decided by a vote of 6-0 to take the following actions  
in MUR 3106:

1. Enter into conciliation with the  
Washington State Democratic Central  
Committee and Clay Bleck, as treasurer,  
prior to a finding of probable cause to  
believe.
2. Approve the proposed conciliation agree-  
ment and appropriate letter as recommended  
in the General Counsel's report dated  
January 10, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald,  
McGarry, and Thomas voted affirmatively for the decision.

Attest:

*Jan 29, 1991*  
Date

*Marjorie W. Emmons*  
Marjorie W. Emmons  
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 4, 1991

Jeff Smith  
Washington State Democratic  
Central Committee  
P.O. Box 4027  
Seattle, WA 98104

RE: MUR 3106  
Washington State Democratic  
Central Committee and Clay  
Bleck, as treasurer

Dear Mr. Smith:

On August 8, 1990, the Federal Election Commission found reason to believe that the Washington State Democratic Central Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a). At your request, on January 29, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

February 4, 1991

Clay Bleck, Treasurer  
Washington State Democratic  
Central Committee  
1701 Smith Tower  
Seattle, WA 98104

RE: MUR 3106  
Washington State Democratic  
Central Committee and Clay  
Bleck, as treasurer

Dear Mr. Bleck:

On August 8, 1990, the Federal Election Commission found reason to believe that the Washington State Democratic Central Committee and Clay Bleck, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a). At your request, on January 29, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Lawrence D. Parrish, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble  
General Counsel

BY: Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

91040865057

06-1 0110

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO  
STATE CHAIR

JEFF SMITH  
EXECUTIVE DIRECTOR

91 FEB 20 AM 10:52

February 12, 1991

Lawrence Parrish  
Federal Election Commission  
999 E Street  
Washington D.C. 20436

RE: MUR3106  
Washington State Demo-  
cratic Central Committee

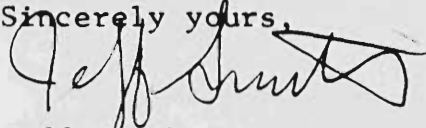
Dear Mr. Parrish,

Here is a copy of the letters we have received to date.  
In addition we received several returns of undeliverable  
letters. We will try to run the rest down.

I will contact you shortly with the name of the attorney  
or attorneys who will represent us in this MUR.

Thank you for your help in this matter.

Sincerely yours,

  
Jeff Smith

91 FEB 20 AM 9:48

FEDERAL ELECTION COMMISSION  
MAIL ROOM

91040865058

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO  
STATE CHAIR

JEFF SMITH  
EXECUTIVE DIRECTOR

TO: People for Ken Jacobsen

FROM: Karen Marchioro, State Chair  
Washington State Democratic Central Committee

DATE: 9/24/90

Our records show that your committee, People for Ken Jacobsen, made a contribution of \$50.00 on 2/04/88 to the Washington State Democratic Central Committee.

This contribution was erroneously deposited in our Federal Account.

In order to determine whether this money could have properly been used to support Federal elections, your account must have contained contributions from individuals totaling \$50.00 as of the date of your check to us.

Will you please review your records for this period and indicate, by letter, whether your account did include funds in the amount of \$50.00 from individuals as of 2/04/88.

If your account did not include \$50.00 from individual contributors on 2/04/88, please call us at (206) 583-0664 to discuss other sources of funds that are acceptable for use in conjunction with federal elections.

On 2/4/88 our account contained  
at least \$50.00 from individuals.

Winnif Fargut  
Treasurer  
People for Jacobsen

KAREN MARCHIORO  
STATE CHAIRJEFF SMITH  
EXECUTIVE DIRECTORACKERLEY COMMUNICATIONS  
OF THE NORTHWEST, INC.

3601 6th Ave S. Seattle, WA 98134 • (206) 682-3833 • FAX (206) 447-0377

TO: Democratic Majority Committee

FROM: Karen Marchioro, State Chair  
Washington State Democratic Central Committee

DATE: 9/24/90

Our records show that your committee, Democratic Majority Committee, made a contribution of \$489.88 on 3/23/88 to the Washington State Democratic Central Committee.

This contribution was erroneously deposited in our Federal Account.

In order to determine whether this money could have properly been used to support Federal elections, your account must have contained contributions from individuals totaling \$489.88 as of the date of your check to us.

Will you please review your records for this period and indicate, by letter, whether your account did include funds in the amount of \$489.88 from individuals as of 3/23/88.

If your account did not include \$489.88 from individual contributors on 3/23/88, please call us at (206) 583-0664 to discuss other sources of funds that are acceptable for use in conjunction with federal elections.

*a Karen,*  
all our money came from individual contributions in the amount of \$10 to \$100. The DMC no longer exists. If you need details - let me know I have the records, I think, I will pull them.

*Krishna  
past. Treas for DMC  
18327 Wallingford Ave N Seattle Wa 98133*



~~June~~  
**LEONARD**

Campaign

312 Wells Avenue S.  
Renton, WA 98055



To: Karen Marchioro

From: Paul Berry, Treasurer  
June Leonard Campaign

Date: 10/2/90

Per your memo of 9/24/90 (copy attached),  
a review of Campaign Treasury Records indicates  
that far in excess of \$50 was in the June  
Leonard Campaign Treasury as of 5/26/88, and  
that far in excess of \$50 had been  
received from individuals contributing individually  
by that date in that year.

I hope this is of use to you. If you  
need more information, feel free to contact me.

91040865061

# Winston & Ceshatt

## LAWYERS

A PROFESSIONAL SERVICE CORPORATION

\*C. Matthew Andersen  
Beverly L. Anderson  
Maris Baltins  
Robert P. Beschel  
John C. Black  
James P. Connolly  
Michael J. Cronin  
Dennis A. Dellwo  
\*Pamela J. DeRusha  
Leo J. Driscoll  
F. J. Dullanty, Jr.  
Robert A. Dunn  
Stephen L. Farnell  
Harriet J. Flo  
Mary Ellen Gattney-Brown  
Tim M. Higgins  
Carl E. Hueber  
Joel C. McCormick, III  
\*Stanley D. Moore  
\*Michael F. Nienstedt

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Facsimile (509) 838-1416

IDAHO OFFICE  
1924 NORTHWEST BOULEVARD  
COEUR d'ALENE, IDAHO 83814  
(208) 867-2103  
Facsimile (208) 864-4816

Fred C. Pflanz  
Lynden O. Rasmussen  
Richard W. Reylea  
Stanley R. Schultz  
Patrick A. Sullivan  
Lawrence H. Vance, Jr.  
Lucinda S. Whaley  
Robert H. Whaley  
Menwether D. Williams  
\*Patricia C. Williams  
of counsel  
James A. Fish  
Joseph J. Rekofke  
Patrick H. Winston  
Leo N. Ceshatt (1977)

All Members Admitted in Washington  
\*Admitted in Idaho & Washington  
†Admitted in Alaska, Idaho & Washington

October 2, 1990

Karen Marchioro  
P.O. Box 4027  
Seattle, WA 98104

Dear Karen:

During the election year of 1988, and as of 11/6/88, my account did include funds paid from hundreds of individuals and those monies could be used for federal elections. If any additional information is needed, please let me know.

Very truly yours,



DENNIS A. DELLWO

DAD:kl

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# WASHINGTON STATE TRIAL LAWYERS ASSOCIATION

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KATHLEEN KESSLER, Hoquiam

**PRESIDENT-ELECT**  
JAMES N. ROGERS, Seattle

**VP EAST**  
ROGER A. FELICE, Spokane

**VP WEST**  
JUDITH M. PROFFER, Bellingham

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WILLIAM S. BAILEY, Seattle

**SECOND VP CLE**  
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**SECOND VP DEVELOPMENT**  
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**VP FINANCE**  
MARY ANN OTTINGER, Bellevue

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**SECOND VP JUDICIAL RELATIONS**  
RONALD PERCY, Seattle

**VP LEGISLATIVE**  
EUGENE M. MOEN, Seattle

**SECOND VP LEGISLATIVE**  
WAYNE LIEB, Olympia

**VP MEMBERSHIP**  
TERRENCE P. ABNEY, Yakima

**SECOND VP MEMBERSHIP**  
RONALD ZEDER, Seattle

**VP PUBLIC AFFAIRS**  
NICHOLAS F. CORNING, Seattle

**SECOND VP PUBLIC AFFAIRS**  
JUDITH A. LANGLEY, Seattle

**SECRETARY-TREASURER**  
T. FANCHER, Spokane

**EDITOR-IN-CHIEF**  
JUDITH S. HELLER, Seattle

**1ST CONG. DISTRICT**  
ANTHONY A. BLESSO, Seattle  
DIP C. ARNEOLD, Seattle

**2ND CONG. DISTRICT**  
CERRY R. ZMOLEK, Bellingham  
THOMAS MOSER, Mt. Vernon

**3RD CONG. DISTRICT**  
JAMES C. SELLERS, Vancouver  
JAMES M. BROWN, Aberdeen

**4TH CONG. DISTRICT**  
DAVID K. CROSSLAND, Yakima  
JILL M. FOREMAN, Wenatchee

**5TH CONG. DISTRICT**  
DAVID E. MICHAUD, Spokane  
JOHN R. CLARK, Spokane

**6TH CONG. DISTRICT**  
FRANK B. LADENBURG, JR., Tacoma  
WINNEY B. RAY, Tacoma

**7TH CONG. DISTRICT**  
RONALD R. WARD, Seattle  
ROBERT K. DAWSON, Seattle

**8TH CONG. DISTRICT**  
MARK BARBER, Renton  
RICHARD F. McDERMOTT, JR., Bellevue

**AT-LARGE**  
A. STEPHEN ANDERSON, Seattle  
TIMOTHY D. ANDERSON, Kennewick  
STEVEN P. KRAECHICK, Seattle

**IMMEDIATE PAST-PRESIDENT**  
DAVID A. MIDDLEBUGH, Seattle

**PAST PRESIDENT'S COUNCIL**  
PATRICK H. LEPEY, Bellevue

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PAUL J. STRIMMATTER, Hoquiam

**ATLA STATE DELEGATES**  
MICHAEL E. WITHEY, Seattle  
BRIAN AABY, Bellingham

**LAWPAC CHAIR**  
KIM K. PUTNAM, Olympia

**EXECUTIVE DIRECTOR**  
ERIK HARTZ, Letting

**GOVERNMENT AFFAIRS COUNSEL**  
MICHAEL TEMPLE

**AMICUS COORDINATOR**  
BRIAN HARNETT, A.C.

September 28th, 1990

Karen Marchioro  
State Chair, Washington State  
Democratic Central Committee  
PO Box 4027  
Seattle, Wa. 98104

Dear Karen:

LAWPAC is in receipt of your letter of 9/24/90 regarding our contribution of \$250 on 10/13/88 that was erroneously deposited in your Federal Account.

Our LAWPAC account did contain contributions from individuals totaling in excess of \$250 on the date of 10/13/88.

If you need any additional information, please feel free to call me at 464-1011.

Very truly yours,

Larry Shannon  
Development Director

People helping people.

1809 7th Ave., #909  
Seattle, WA 98101-1324  
(206) 464-1011  
FAX (206) 464-0703

W 1408 Broadway  
Spokane, WA 99201-1901  
(509) 326-6660  
FAX (509) 328-7596

123 Fir N.E.  
Olympia, WA 98506  
(206) 786-9100  
FAX (206) 786-9103

1  
TOM RETTERATH  
State Legislative Director  
Washington State  
Legislative Board



***united transportation union***

3330 Nebraska St.  
Longview, WA 98632  
(206) 425-3363

September 28, 1990

Karen Marchioro  
State Chair  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle WA.98104

Dear Karen:

In regard to your letter dated 9/24/90. All of the contributions we make through our PAC, Transportation Political Education League, are voluntary donations from Washington residents belonging to the United Transportation Union.

Also, please note our office has moved to Longview and we have a new phone number. Best regards, I am

Sincerely,

*Tom Retterath*

Tom Retterath  
State Legislative Director

91040865064

KITSAP COUNTY

**DEMOCRATIC CENTRAL COMMITTEE**

P. O. Box 27 • Silverdale, WA • (206) 842-6275

**Richard M. McCool**  
Chairman

Box 11347

Bainbridge Island, WA 98110

October 8, 1990

Karen Marchioro  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle, Washington 98104

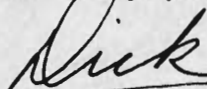
Dear Karen:

In response to your letter of September 24, 1990, concerning the Kitsap County Democratic Central Committee's donation of \$100.00 to the State Central Committee on February 15, 1988, I can report that, according to our records, we had \$2,805.00 in our account at that time and we estimate that all of it was received from individual contributors.

Donations to KCDCC from organizational contributors are relatively rare.

With all best wishes, I am,

Sincerely yours,



Richard M. McCool

91040865065



October 1, 1990

Karen Marchioro, Chair  
Washington State Demo. Central Comm.  
P.O. Box 4027  
Seattle, Wa.

Dear Karen:

Regarding the contribution of \$1,100.00 from the 4th District Democratic Committee to the Sally Jackson Campaign in 1988. Of course it was from individual contributors. Furthermore, the contributions were primarily made \$1.00 at a time. We are not aware of any other available sources of funds. If you have any other suggestions, please advise.

Sincerely

  
Allen Rozeboom  
4th District Chair

91040865066

Committee for Dolores Sibonga  
P.O. Box 3274  
Seattle, Washington 98114

Karen Marchioro, Chair  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle, Washington 98104

Dear Ms. Marchioro:

A review of our records for the period of time you mentioned in your 9/24/90 letter shows that our checking account contained contributions from individuals as of 8/12/88. Our account contained only contributions from individuals at all times as that was the nature of the account.

I hope this clarifies the matter sufficiently.  
If not, please advise.

Sincerely,



Rose Landberg, Treasurer  
Committee for Dolores Sibonga

cc: Dolores Sibonga

91040865067

October 18, 1990  
3005 69th SE  
Mercer Island, WA 98040

Karen Marchioro  
State Chair  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle, WA 98104

Dear Karen:

In reference to the attached letter I would like to confirm that the 41st District Democratic Organization did in deed have contributions totaling at least \$50.00 from individual contributors in it's bank account as of 03/01/88. A substantial majority of contributions to the 41st District Democratic Organization do come from individual contributors.

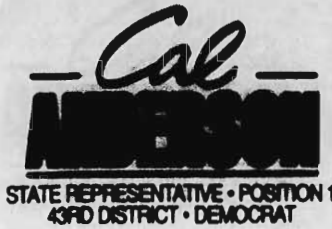
If you require further assistance of the 41st District Democratic Organization regarding this matter please feel free to contact me.

Sincerely,

*Edward C. Flash*

Edward C. Flash  
41st District Democratic  
Organization Treasurer

91040865068



October 13, 1990

Karen Marchioro, State Chair  
Washington State Democratic Central Committee  
P.O. Box 4027  
Seattle, WA 98104

Dear Karen:

We have received your letter of September 24, 1990 indicating our contribution of 12/12/88 in the amount of \$125.00 was inadvertently deposited in your federal account.

A check of our records indicates our account did contain contributions from individuals totalling at least \$125.00 at that time.

If you need any further information, please feel free to give me a call.

Sincerely,

Eric Ishino  
Treasurer  
Committee to Elect Cal Anderson

06C 02 72

WASHINGTON STATE DEMOCRATIC CENTRAL COMMITTEE

KAREN MARCHIORO  
STATE CHAIR

JEFF SMITH  
EXECUTIVE DIRECTOR

March 4, 1991

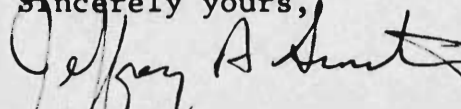
Lawrence M. Noble  
General Counsel  
Federal Election Commission  
999 E Street  
Washington D.C. 20463

RE: MUR 3106  
Washington State Democratic Central  
Committee and Clay Bleck, Treasurer

Dear Mister Nobel,

This letter is to inform you that we have retained the Perkins Coie law firm in Washington D.C. to represent the Washington State Democratic Central Committee with respect to MUR 3106. Our contact person there is Ms. Judy Corley or Mr. Bob Bauer.

Sincerely yours,

  
Jeff Smith

91 MAR -7 PM 9:29

FEDERAL ELECTION COMMISSION  
MAR 10 1991

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PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
1110 VERMONT AVENUE, N.W. • WASHINGTON, D.C. 20005 • (202) 887-9030

March 28, 1991

Lawrence M. Noble  
General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 3106 - Washington State Democratic Central  
Committee and Clay Bleck, as Treasurer

Attention: Lawrence D. Parrish

Dear Mr. Noble:

This letter is the response of the Washington State Democratic Central Committee ("the Committee") and Clay Bleck, as Treasurer (collectively referred to as "Respondents") to the Conciliation Agreement proposed by the Commission in the above-referenced Matter Under Review.

All of the issues raised by the Commission in MUR 3106 stem from the same factual situation that brought the Committee before the Commission in MURs 2859 and 2869. As explained in the various responses filed in connection with those MURs, in 1988, a single individual was responsible for compliance with the FEC reporting and recordkeeping requirements (as well as for compliance with state election law and other statutes). For unknown personal reasons, the individual failed to perform his duties and has since been removed from his position. Attached for your information is one of the letters submitted in connection with MURs 2859 and 2869 which explains in more detail the circumstances surrounding this individual's departure. Exhibit A.

The result was clear: reports that needed to be filed were not, and certain accounting and administrative activities that should have been performed were done incorrectly. At one

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point, for example, a deposit of federal funds was made into the nonfederal account at the same time the deposit of nonfederal funds was made into the federal account.

In the aftermath of this individual's performance, it was necessary for the Committee both to correct the errors that had been made and to train new people to take over the responsibilities previously performed by this individual. The Committee has now done this, assigning several individuals, instead of only one, responsibility for various aspects of the FEC reporting and recordkeeping requirements. The substantial number of amendments to the Committee's reports filed in 1989 are the direct result of the corrections made by the Committee following this individual's departure.

This is not a case of pervasive and chronic problems with compliance or a disregard of responsibilities under the FECA. The facts show that the Committee experienced a one-time breakdown in its normally adequate systems. The effort it has made to correct and improve its systems demonstrate that this one-time occurrence is unlikely to ever happen again.

The Committee's good faith in this matter is further shown by the fact that it promptly transferred all contributions identified by the FEC to its nonfederal account even though, in fact, not all such contributions needed to be so transferred. As a sample of letters received by the Committee shows, in Exhibit B, the majority of the contributions identified by the Commission were from state candidates and local party committees which, while permitted under state law to accept corporate and labor organization funds, had sufficient contributions from sources lawful under federal law to cover the amounts of contributions made to the Committee. Because the majority of these contributions were also less than \$1,000, the Committee could have accepted those contributions into its federal account.

The Committee, a state party committee, received thousands of contributions totaling hundreds of thousands of dollars in 1988. Despite the accounting problems experienced by the Committee, the vast majority of these checks were processed without controversy. The Commission has identified only a handful about which it could raise any question. Furthermore, since 1988, the Committee's system has been working well. There have been no missed FEC reports, and the accounting and recordkeeping procedures have flowed smoothly.

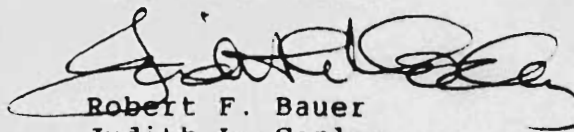
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Lawrence M. Noble  
March 28, 1991  
Page 3

91040865073

Lawrence M. Noble  
March 28, 1991  
Page 4

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert F. Bauer", written over the printed name.

Robert F. Bauer  
Judith L. Corley  
Counsel to Respondents

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0249m

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS  
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

July 19, 1991

Lawrence Parrish  
Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: MUR 3106

Dear Mr. Parrish:

Pursuant to our discussions, please find enclosed an executed conciliation agreement in the above-referenced matter under review.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

  
Judith L. Corley  
Counsel to Respondents

Enclosure

JLC:smb

91 JUL 19 PM 3:08

91 JUL 18 11:02



RECEIVED  
F.E.C.  
SECRETARIAT

91 AUG 22 11:21

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Washington State Democratic )  
Central Committee and Clay Bleck, )  
as treasurer )

**SENSITIVE**

MUR 3106

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed  
by Judith L. Corley, counsel for the Respondents.

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**II. RECOMMENDATIONS**

1. Accept the attached August 15, 1991 conciliation agreement with Washington State Democratic Central Committee and Clay Bleck, as treasurer.
2. Close the file.

3. Approve the appropriate letters.

Lawrence M. Noble  
General Counsel

8-21-91  
Date

BY: Lois G. Lerner  
Lois G. Lerner  
Associate General Counsel

91040865080



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Washington State Democratic ) MUR 3106  
Central Committee and Clay Bleck, )  
as treasurer. )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 28, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 3106:

1. Accept the August 15, 1991 conciliation agreement with Washington State Democratic Central Committee and Clay Bleck, as treasurer, as recommended in the General Counsel's Report dated August 21, 1991.
2. Close the file.
3. Approve the appropriate letters, as recommended in the General Counsel's Report dated August 21, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision;  
Attest:

8-28-91  
Date

Marjorie W. Emmons  
Marjorie W. Emmons  
Secretary of the Commission

Received in the Secretariat: Fri., August 23, 1991 11:21 a.m.  
Circulated to the Commission: Mon., August 26, 1991 11:00 a.m.  
Deadline for vote: Wed., August 28, 1991 11:00 a.m.

dr

91040865081



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

CLOSED

September 9, 1991

Judith L. Corley, Esquire  
Perkins Cole  
1110 Vermont Avenue, N.W.  
Washington, D.C. 20005

RE: MUR 3106  
Washington State Democratic  
Central Committee

Dear Ms. Corley:

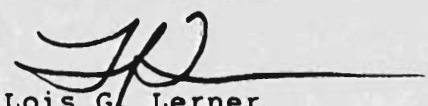
On August 28, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of Washington State Democratic Central Committee and Clay Bleck, as treasurer, in settlement of violations of 2 U.S.C. §§ 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 102.5(a), a provision of the Commission's regulations. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Lawrence D. Parrish, the attorney staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble  
General Counsel

BY:   
Lois G. Lerner  
Associate General Counsel

Enclosure  
Conciliation Agreement

91040865032

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Washington State Democratic ) MUR 3106  
Central Committee and )  
Clay Bleck, as treasurer )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Washington State Democratic Central Committee and Clay Bleck, as treasurer, ("Respondents") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondents are a political committee within the meaning of 2 U.S.C. § 431(4).

2. Clay Bleck is the treasurer of the Washington State Democratic Committee.

3. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), organizations that are political committees under the Act which finance political activity in connection with both federal and nonfederal elections and have established a separate federal account, such account shall be treated as a separate federal committee. Only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account.

4. Pursuant to 11 C.F.R. § 102.5(a)(2), contributions that are deposited into an account that finances federal activity must meet three conditions: (1) the contribution must be designated for the federal account; (2) the solicitation must expressly state that the contribution will be used in connection with a federal election; and, (3) the contributors must be informed that all contributions are subject to the limitations and prohibitions of the Act.

5. Pursuant to 11 C.F.R. § 103.3(b), the treasurer of a committee is responsible for examining all contributions received for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions, exceed the contribution limitations.

6. The Committee's 1988 Year-End Report disclosed receipts totaling \$14,667.87 from thirty-three (33) unregistered organizations located in the State of Washington or Washington, D.C. The State of Washington permits corporate and labor union contributions, and Washington, D.C. permits labor union contributions.

7. The Committee subsequently transferred the full amount received from the unregistered organizations to its nonfederal account. The Committee also sent letters to each of the contributing organizations notifying them that their contribution were being transferred to its nonfederal account.

8. Pursuant to 2 U.S.C. § 441b(a), it is unlawful for a corporation or labor union to make a contribution or expenditure in connection with a federal election, or a candidate or political committee knowingly to accept such a contribution.

9. The Committee's reports disclosed receipts totaling \$7,775, from seven (7) corporations and labor organizations.



10. On January 9, 1990, the Committee transferred the full amount of the apparent impermissible contributions into its nonfederal account.

11. The 1989 Mid-Year and Year-End Reports disclosed the transfers out on schedule B for the apparent impermissible contributions which were made in April, June, July and August.

V. 1. The Respondents accepted contributions from unregistered organizations not subject to the prohibitions and limitations of the Act, and deposited such contributions into their federal account in violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).

2. Respondents knowingly accepted contributions from corporations and labor organizations and deposited such contributions into their federal account in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a). Respondents contend that the violations in question in this MUR and in MURs 2859/2869 previously considered by the Commission were the result of the failure of an individual responsible for compliance with FEC reporting and recordkeeping requirements to perform his duties and that Respondents have since taken steps to insure that such violations do not occur in the future.

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two thousand dollars (\$2,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

(a) One (1) initial payment of five hundred dollars (\$500) due thirty (30) days after the date this Agreement becomes effective;

(b) Beginning thirty (30) days after the date of the initial payment, six (6) consecutive monthly installment payments of two hundred fifty dollars (\$250) each;

(c) Each such installment payment shall be paid no later than thirty (30) days after the previous payment;

(d) In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the Respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

2. Respondents agree that every effort will be made to ensure that only funds subject to the prohibitions and limitations of the Act will be deposited into its separate federal account, and that in the event of an inadvertent deposit of other funds into that account, prompt corrective action will be taken into the guidelines set out in the Federal Election Commission Regulations.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.


X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written

or oral, made by either party or by agents of either party,  
that is not contained in this written agreement shall be  
enforceable.

FOR THE COMMISSION:

Lawrence M. Noble, Esq.  
General Counsel

BY:

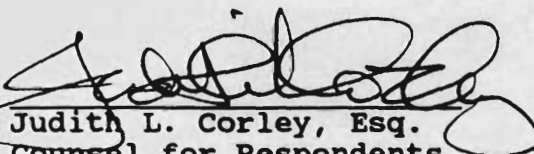
  
Lois G. Lerner, Esq.  
Associate General Counsel

Date

9/6/91

FOR RESPONDENTS:

BY:

  
Judith L. Corley, Esq.  
Counsel for Respondents

Date

7/19/91



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3106

DATE FILMED 10/18/91 CAMERA NO. 2

CAMERAMAN AS

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO  
THE PUBLIC RECORD IN CLOSED MUR 3106.

1/15/92

92040392033



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CLOSED**

January 13, 1992

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Judith L. Corley, Esquire  
Perkins Cole  
607 14th Street, N.W.  
Washington, D.C. 20005-2011

RE: MUR 3106  
Washington State Democratic  
Central Committee

Dear Corley:

On August 28, 1991, the Federal Election Commission and your clients, Washington State Democratic Central Committee and Clay Bleck, as treasurer, ("Committee") entered into a conciliation agreement in settlement of violations of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a). According to the agreement, your clients were required to pay a civil penalty of \$2,000.00. The conciliation agreement provided for installment payments, with your first payment due on September 28, 1991, and additional payments due on the 28th day of each successive month, until March 28, 1992.

According to Commission records, the Committee's payments for the months of September through December have not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payments from your clients in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact me at (202) 219-3400.

Sincerely,

Lawrence D. Parrish  
Attorney

92040392034



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO  
THE PUBLIC RECORD IN CLOSED MUR 3106.

2/19/92

92040392128

KAREN MARCHIORO  
STATE CHAIR

JEFF SMITH  
EXECUTIVE DIRECTOR

**CLOSED**

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RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK

January 30, 1992

Lawrence D. Parrish  
General Council's Office  
Federal Election Commission  
999 E Street N.W.  
Washington D.C. 20463

Re: MUR 3106  
Washington State  
Democratic Central  
Committee

Dear Mr. Parrish,

I am sorry to have misunderstood the workings of the F.E.C. After I signed the conciliation agreement on MUR 3106 I thought that I would hear from the Commission that the agreement was finalized. I delayed making payments because I didn't know when I was supposed to make them.

I am enclosing the full payment of the fine with this letter.

Sincerely yours,

*Jeffery A. Smith*  
Jeff Smith

92FEB-3 AM 10:54

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF THE CLERK

• OVP •

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