MEN HE (C)

### SANDLER, REIFF & YOUNG, P.C.

April 17, 2009

Ms. Wanda Thomas
Acting Assistant Staff Director
Audit Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Ms. Thomas:

This letter, and attached exhibits will serve as the response of the Washington State Democratic Central Committee ("WSDCC") to the Interim Audit Report ("Audit Report") of the Federal Election Commission's Audit Division ("the Audit Division") for the period covering the WSDCC's financial activities for 2003 and 2004.

The response to each of the Audit Division's five recommendations is as follows:

#### Recommendation #1

The Committee has reviewed the recommendation and has reviewed the documentation provided by the Audit Division. After a review of documentation provided by the Commission the committee agrees that these transactions require amendment. However, the appropriate amendments are not entirely in sync with the Commission's recommended changes. Attached, as Exhibit 1, is a spreadsilect that explains the disposition of each amended item.

### Recommendation #2

The following represents the disposition of the Commission's finding on excessive candidate contributions:

Alben 2004 – The committee made a \$3,000 contribution to the Alben campaign that was designated for the general election. However, Alex Alben was unsuccessful in his bid to obtain the Democratic nomination for Congress. The Alben campaign was required to refund the \$3,000 contribution to the WSDCC in accordance with 11 C.F.R. § 102.9(e)(3). However, the Alben campaign failed to make a refund and was permitted to terminate the committee by the Commission in March 2005. Therafore, the WSDCC is unable to request a refund at this time.

300 M STREET, S.E., SUITE 1102 • WASHINGTON, DC 20003 • Tel.: (202) 479-1111 • FAX: (202) 479-1115

Barbieri for Congress - \$1,500 of the May 20, 2004 contribution was intended for the primary election. The report has been amended to clarify this intent. A portion of the in-kind for voter file has been report to Schadule F. Lies 25 as a mordinated expanditure.

<u>Friends of Sandy Matheson</u> – The in-kind contributions have been reclassified as coordinated expenditures and have been moved to Schedule F, Line 25.

### Recommendation #3

The committee acknowledges the reporting errors regarding its Levin activity and has amended reports to correct these errors.

#### Recommendation #4

The committee has reviewed this recommendation and has determined that only two of the communications listed on the Commission's spreadsheet were, in fact, independent expenditures. These two expenditures have been moved to Schedule E, Line 24. All other communications listed on the Commission's spreadsheet were either coordinated communications or volunteer exempt activities. Furthermore, a number of the communications included non-federal candidates and generic references to the Democratic Party. Expenses with such references have been allocated to Lines 29 and 30(b) as appropriate. The spreadsheet attached as Exhibit 2 explains the disposition of each communication on the Commission's spreadsheet. It should be noted that one of the mail communication on characteristic on behalf of Patty Murray, entitled "Too Extrema" urse q volunteer exempt activity. An affidavit and athor documentation to dammastrate that this was volunteer exempt are attached as Exhibit 3. Other mailings an behalf of Patty Murray were intensited as coordinated expenditures and have been moved to Schedule F, Line 25.

It should be noted that there are several mailings undertaken on behalf of John Kerry, the Democratic nominee for President listed on the Commission schedules. It is the WSDCC's belief that these mailings were intended as volunteer exempt activities. However, the committee has been unable to locate any documentation regarding the volunteer participation with respect to these communications. In accordance with the committee's belief that these were exempt activities, the disbuttements have been mayed to Line 30(b).

### Recommendation #5

The committee has carefully reviewed the Commission's finding and recommendation and disagrees with both the Commission's conclusion and legal analysis. First, the Commission offers no regulatory citation for (and no citation existed with respect to 2004 activities) with respect to the requirement that funds raised that "convey a plan" to promote, support, attack or oppose a federal candidate must be deposited into a federal account. To be sure, the Commission promulgated a regulation that requires contributions that are solicited with the intent to exclusively support or oppose a clearly identified federal sensitidate must be deposited into a federal account. This regulation did not take affect until January 1, 2005. The Commission may not retroactively apply

<sup>&</sup>lt;sup>1</sup> 11 C.F.R. § 190.57(b). The WSDOC questions whether the Commission mally intended to include party commisses within the purview of this regulation. The regulation requires that no more than 50% of contributions raised through

the regulation to activity by the WSDCC that took place in 2004. The committee's fundraising efforts were, in fact, in furtherance of its efforts to support the election of state and local candidates and were depunited into the committee's non-excempt account which was limited to contributions of \$3,400 per year in 2004. Due to this limitation, the committee must use small dener, intermedicting activities to fund activities on behalf of sinte and local candidates.

The committee also disagrees with the Commission's finding with respect to the fundraising expenses. First, the committee disagrees with the Commission's use of MURs 5403 and 5466 as authority for the proposition cited by the Commission that fundraising communications that PASO a clearly identified federal candidate are "expenditures." These matters involved the abuse of the Commission's allocation regulations by a non-connected PAC who purported to raise impermissible non-federal funds for the purpose of using those funds to influence a lections. It was in that econtext that the Commission made its findings. In this matter, the WSDCC was depositing federally permissible funds into its non-federal account for the purpose of influencing non-federal elections. As described above, the motivation behind this fundralising was not to use the funds to influence any federal election but rather, due to the restrictive nature of Washington campaign finance law and the need to fund an account to spend funds directly on behalf of state and local candidates. It serves no legal or policy purpose to demand that the WSDCC return these funds to the federal account (which would ironically result in a federal fund windfall for the state party). Likewise, it serves no legal or policy purpose to require the WSDCC pay for these fundationing expenses with federal funds.

Second, the committee disjunten that the script actually attrains as emposent a federal candidate. The communication memby states that the WSDCC has a plan to defeat George W. Bush. It does not, in any way, attack President Bush's plans or projects, or attack his character. The letter merely discusses the general plans of the WSDCC, which in a presidential election year, would obviously include activities in connection with the presidential election. Thus, in 2004, it was within the WSDCC's rights to deposit any or all of the funds raised by this mailing in the committee's non-federal account. Furthermore, the committee was permitted to use non-federal funds to pay for these expenses.

Although the WSDCC disagrees with the finding and recommendations of the audit report, the committee infinded to comply with the Commission's recommendation with range in Finding #5. However, at this time, the committee has only \$5,813 in its "non-exempt" account, the account into which these funds were deposited. Due to the restrictive nature of the contribution limits to this account, the committee has difficulty raising funds for the account, other than through small donor fundraising. The committee does maintain an unrestricted "exempt" non-federal account for activities that do not directly influence non-federal elections. The WSDCC sought guidance from the Washington State Public Disclosure Commission as to whether it was permitted to use exempt funds to comply with the Commission's recommendation. The WSDCC has been informed by the Public Disclosure Commission that any attempt to use exempt funds to comply with the Commission's recommendation of Washington exampling firmance

reference to federal and non-letteral elections be deposited into a non-federal account. This ratio is consistent with the 50% fadical allocation formula for non-party political commutates but is inconsistent with the allocation formula for state and local party committees which range from 15% to 36% federal.

law. In addition, as of April 17, 2009, the WSDCC only has \$19,241 in its federal accounts. Therefore, the WSDCC is unable to comply with the Commission's recommendation at this time.

Based upon our objections to the findings, the committee does not intend to amend its reports at this time, but will consider filing such amendments if the Commission, by a vote of a majority of its members, disagrees with the committee's response to the Interim Audit Report.

If you require any further information, or have any other questions, please call me at (202) 479-1111.

Neil Reiff

Counsel to the Washington State Democratic

Central Committee

### **EXHIBIT 1**

į

M						ŀ					1001	edD% itemy	h Peny, Sth garaft	VOD's Henry	Wit Harry, Complete and Generic, ECIA Marray	Marry, WK Kerry	MOTh Remy	1004 (807)	27%. Each for Origins. Many and Henry	Art-15 kerr, Ougsee and Scrrey (312,36,185 AG-14 kery, Organia Marty Remit (51,365,35)	
<del> </del>		L		H	Butte		a a a a a a a a a a a a a a a a a a a	F	1	LI I	Į į	E T	£	ľ	Pro	11	Witang	Paris	<u>"</u>	I	ļļ
			Correct Activity or Brest	18	Move to Schooline F, Line 25	Move to Schooler F, Ling 25	Man to Schauble F. Live 25	Men to Schoolde S. Line 30(0)	New Schaufe F, Line 25	A STATE OF	Whater Duryl, Lane on Schedde B, Live 30k)	Valuation Energy, Leans on Extradists B. Live 30(ts)	More in Lies 30(th, part generic	Man to Una 2005, Volumes	Mare to 2000) on Vocateur	Mare to 2000 on Vacamer	Mone to 20(b) as Vourteer	thing of the Style whereing	Marroy and Marry to Schaplate E. Live 25s, Gregore portion to Live 20(b)	Stream E. and Generic a 30(b)	
,				Condinated	-	Continued	Coordinated	Constituted	Constituted	100	jaga adaga a		Independent	- Chapter Cont	<b>Jacquellique</b>		- Anna Anna Anna Anna Anna Anna Anna Ann	)			
\$			A. C.	D.T. C. Pa. 1-M. Express Advances for Paris District, Print by HTDDC and Authorized by Prayto for Paris Marrier, reported in "Consultant - Geometry" on Phy. Broad in Paperson on Schools, P.	-	D.7.4 (The Bookest Inthication of Commission of Chancel to Present on Commission Commission of Commi	D.3.1. p. c.2. D.G. t. Pr. 23-80. In GOTV company emport Party Street Schaper reprint Games Madesonal Madeson, Party William Schaper on American Printers for Party Manage, Party Street William Co. S. Andrewson, P. J. C. Street, Manage, Street Str.	D.3.1, P. B. D.3.1, Pr. 24-32, In ODTV statemy, space Observation of the Control of Tray Stateman in Programmy on Extension of the Control of Tray Stateman in Programmy or Extension of the Control of t	D.13, Pp. 19-27, B.13, Pp. 24-32, in GOTV company required of the company of the	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAM	A. I. C. F. F. A. M. S.	D.S.L. Py. T. M. species of Theking - GOTV on Mr. September of the Control of the	D.3.7, Pr. 24; D.12, 1, Pr. 2021 is genetic company antisy integral, Respect Corry Maley, Operas State million, Publicy WINDOC, S. 10, Antisymment State State Magnatus Scientific States in International Engineers.	D.M.F. Fr.D.E.I. Pr. of 48th in grown compulys called managed programming. Propert Namy Matter, Organo State called Paul by WIDDOS & the Annument, Charle in Reported on Endman & on Indomental Report Name .	to the figure on the country to the country for the country fo	DAL Pr. Dr. G. C. L. Pr. Com. is GOV compry Superinters.  Commission Commission Science Superinters.  Commission Commission Science Street WINDOW In Street Science  Commission Commission Science Science Science Science  Commission Commission Science Science Science Science Science  Commission Science	DAA, Ps. Marijis OOTV origen; Kony Pennada mak Marid ta Reprint on Marida II on the September Deputation	CALL Pr. GATZ-STORMS Prop. Communication or communication of the communi	10.3 A.P. (RACE better interned properties to confidence (TALIER)  In cold that invested in the last of the confidence of the cold the col		
~				2010700	80 OSS	\$110	8 00 THE	STEP STATE	948.008.05	STANCED IN	CE 97.578	8117,730.00	287,580 Bb	SR2,428 ED	10 229 085	2007 SE	\$10,400	86,080,19	573,800,00	S14.638.01	
°			Absorbes Address or Event				80	Vioe	AL O				Ourse Company	Owers Company	Ourticonpuly	AGIV.	901/	ALDE	aon	2	
			į	Pully Morrey Olived numbers	elumin .	betterd for recorn market	Dend that . GOTV	BOTV Net	VIODA .	A CONTRACTOR OF THE PARTY OF TH	Karyfishants Dinat	KempEshambs Dhool meditiga	Vary Domos Pitrio Paring	FEA - Presention	FEA. Production	A00- <b>has</b>	Oceaniting OrganishyGGTV	OCIV Pering	OCTV Temperature	V Telephonius	
•	$\downarrow$	Ľ		8	B	8	8		8		-	2		2	1		8		8	<b>.</b>	1
-		L		80 CDL TOLOGO	830000	\$110.00	80 am	CAST.SPace	900000		0 100.0030	S117,732.88	987,609.00	S 405 404 60	*asrus	8800	* 538,450	87280'13	FREBERS	- Carriero	
2		L	3	8	80 8053	91.10.ED	OF BOAR ISO	DIT GITTS SCALAFOLDS	go quarant		2	8117,737.88	807,000	2 8	4705 18	Se de la constante de la const	PP COPYECS	197200'13	STABLES	50 THE SEC. O.	<b>東京の東京の大学</b>
1			8	5	- F	9	5	5	<u>.</u>		<b>E</b>	5	<u> </u>	<u> </u>	5	<u> </u>	<u> </u>	<b>.</b>		!	
1					8	ğ								<u>.</u>							•
			1	Victory 2004 Federal	Federal Assert		Victory 2004 Pederal	Federal Account	Matery Federal I	The state of the s	Matery Personal II	Victory Federal	Matery Pederal S	Victory Federal I	Victory Federal	Meny	Menny Personal	Velley 2004 Federal	Matery 2004 Federal	Matery 2004 Faders	
4				. 8	POSTADO	CHESTON	70 90 8	10 TOTO	PORÇESI	إيم	- Orași	10000	96.0	8	105201	1000	10280	101101	10eros	9	7
†	Ī		4	E	6	ğ	į	1	1		£	i.	š	1	i.	Ě	Š	8	<b>2</b>	8	, · 2,
•	F	Ī	1	5	Y	*	5	5	8		5	5	5	5	8	8	8		\$	- 1	•
			8	Ban Prancisco	į	I	1	1	-	*	Į	P. Park		1	Se Person			1	Puter Barbage	***	
	-	-			3	3			<u></u>			-					_				
٩	Exit Conference		į	of being heat	707 W mains Ave	712 W spins Are	60 beary See	60 bears the	place (and p		Act Balany Stead	to Beary Seal	10 mary 20 m	Pag Lagar	ect Batery Sweet		1800 - 21st Street Sades 100	2400 W Commaders Way	121 S Pain Conput Dhea 4005	8 Palm Carpon Dive	:*1
C C	Westoguts of Disburgement Errors Given at the Euk Conference		j		П	Seattle Labor Temples Darbert for		AMS Communications, Pr.	MB (married ), 12		MAS Committedies, In.	Mill Commissions, Its.	Add Commissions, Inc.	ME Completes, In.	AME Communications, Inc.	Add Commissions, In.	Pul Ourise Companys Consulting	PAN Ched Hanging Inc.	Proce Inc.		一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一 一
	1000		5]	£	å		A	A	4		4	8	á	4	å	Ř	4	A	å	4	1
4	H		H	•	Ŧ	Ŧ	2	2	₹.	*	•	•	2		1	•				7	

The Control and Educationary, in. 2004 September 1, 2004 September 21 (Control and Educationary), in. 2004 September 21 (Control and Educationary)	1 6 5 5 5 5 5 5 5 5		Date   Da	1 2	11 2					<b>A</b>	Current Activity or Brent	į
	2 5 5 5 5 5 5 5 5 5	<u> </u>		1	+		11	$\sqcap$		Audit Companies	Correct Autholy or Board	8
	1 5 5 5 5 5 5 5 5 5			A Passent Matter	+		Į	T	7	Audit Consessed	Cornel Authory or Brent	1
100   100	5 5 5 5 5 5 5 5 5		3	1	_			_				
GE OF CONTROL OF CONTR	5 5 5 5 5 5 5 5				-		St. 182.20		81,788.20	in Marke IV a Admit Braid in spend in Denke I. Live Schools B. A. C. Chicales B. C. Chicales B. Chical	Mone to Beleade S, Live 219	ij
	5 5 5 5 5 5		CBONIS Federal Account	1	ļ	\$110 PER \$117	Professional Professional States	1	***************************************	Not desirable on the production of the form the figures of the state o	Abrest Schutch & Live 270	Wines Schoolde
of Sharefungs, is, 200 i Squided has 25 of Sharefungs, is, 200 i Squided has 25 of Sharefungs, is, 200 i Squided has 25 of Sharefungs, is, 200 i Squided has 26 of Sha	8 8 8 8 8 8		MACHED POSSY	1	9	4718 BITA	917,543 00 Salaharahadi Salaharahadi	1	817.543 18	Pict chances and the was paid will stiff them have for the behinds	Mana to Schools B. Live 210	Sec.
of Secretary, is 200 feptides to 200 feptides	8 8 8 8 8	L	OWENCE PORE	2	- F	910,429.43 \$10,4	\$10,429.43 Party belonging to	1	0760715	Not alterate serving that was 1975 to be not because the serving of the serving o	Mans to School-As E, Line 215	erpane Bases
and Debaumigrager, inc.  200 H Deplement  Ann. 200 H Deplement  An	5 5 5 5	_	George Posm	Į	8	25.00.00	on principal to a second secon	senter Bu	3014.08	property is a company of the company	Mone to Schwadde II, Live 219	egyedg Basas
of Shantangs, in. 201 Squires 648 55 or Shantangs, in. 201 Squires 648 55 or Shantangs, in. 201 Squires 648 50 or Squires 648 50 or Squires 648 50 or Squires 648 50 or Squires 648 50	5 5 5	90	09/71/03 POSE2	2	<u> </u>	ערון	STALEGOLDS Party behaviorally by	and the same of th	20000014.8	Appendix to the contract of th	Name to Schoolde S, Live 219	Types Sample
of Sharelarys, in. 30 it Spalms has 30 and distributions, in. 300 it Spalms has 30 and distributions, in. 300 it Spalms has 30 and distributions, in.	8 8	90	09/09/03 F0SF1	2	ž Š	84,731.10 S16,7	STE,721.10 Pury unimutable	Attach	\$16,731.10	And the state of t	Mone to Schools S, Uny 250	erpass Augus
and deformalization, 160, 150 of Supplements Date (200 of Supplements D	8	100	GATAND FORE		1 B	277,500.00 [277,6	On ASS, 722	1	227,428.00	No. decade until parame part with 1979 betwee from properties of the properties of t	Mare to Schudde S, Lin 215	Property of the last of the la
Erinatumys, ht. 330 transment	+	90	Ch/Ziless Prodez	2	9	8000	-	1	8	The design make had was put with 1979 taken hade. Described the Committee of the control of the	Mare in Exhauth & Lies 219	11
	5	Page 2	SENZICO POSEZ	1	100	\$12717.EB 816,	Part Security St. The Control of the	1	814,717.55		Mare to Consulta & Line 219	1
rden and Schwerberger, he. 300 pirespend in Sale 300 Sweepen	5	1	Dezeros Poeza	1	8	Secure Sec.	Programme Promy international	1	80,488	O.A.S. P. It has demands which the was paid with 1997s below the following the followi	Checker Surman B, Une 279	aypaing Basia
des ged Echanisters, Ir. 200 Högelends Bale 200 Million	δ 1	9 9	torses Four	1	8	14180 3141	SA MALES	1	874,186.63	D.A.C. P. R. Hat decade activity that was paint with 1975 feature.  Sand Report on Decade hit or Audit Decade to sparing on  Sand to B. D. S.	March Spinkle B. Ura 279	rie de
Cortics and Schweidunger, fre. 200 H Septemb	8	9688	1073/03 F0802	1	8	N N N N N N N N N N N N N N N N N N N	Market Transport	į	T W	12 14 2	Move to Schucket St. Una 21b	oppning Banan
Outles and Exhaustesayer, Str. 200 H Septembe Bade 200 G September 200 G Septe	5	98 92	nevo Peee	1		20.00.00	St. 101.02 San Library Lands San Library Lands	P.	291/03186	DAG, P. C. Har districts. many that manufacture of Party Barnels Branche Branc	Manu to Schwickle St. Live 219	eyphong Banish
orden and Schaufereger, Inc. 300 Hilligebreits Sale 200 (8 flegards	5	8	29000 10805	1	8	2	Carlotte Control of the Control of t	į į	27 1985	State of the state	Mane in Schmidde S, Uno 218	erymine Banga
arten and Behantensyer, int. 300 H Septembe   Date 300 H Departs	5	8	COORTS FORM	1	3	87 WE	SE: 185	1	8	DALL P. R. Hai diguste annis para man year othe 1975 factors facely Reported on Member 194 on Advince Street to Separate on the control of Live Street company type of activity Progress of Proxy Advantages from Internation	Mane in Schoolde B, Lins 210	Argusta Brougs
nten and Echemistranyer, Inc. 2004 Stephends (pub 200 S Begund)	_5	900	Section 1982		2101	17,001.02 S17,0	S17,E21.02 Party takeneriality	1	10 m	DALL, P. T. His design and a few from your safe the beauth face; Report or Security NV or Acts (204). Should be reported in Security S. Line 2 by company has all which Propose all Party.	Mare to Extraction & Live 215	Trans.
beton and behavestanger, Inc. (200 Hillspecials (200 G Separal	ð	965	Cachos Foili	-	į	\$17,984.13 \$17,1	SIT, WA. US. DOOR OLD MAN AND AND AND AND AND AND AND AND AND A	14	847,194.13	D. C. P. T. Hardwards and an immediate the control of the control	Mare to Structule & Uno 319	ij
nten and Schwertenger, Inc. 300 Mapping.	5	290 B	nication Front		2	PR.JAR.TO	PRACTICAL TO PURCHASE AND	3	Pitchel.78	D.A.C. F. R. Hai dimando activir est una parti altre batenti hand: Reported en Balando HH — Adain (2012) Ellend to reported to Enterior E. Lin 21s, company to the ability. Prepare als Pr	Mare to Spinstel S. Line 3%	11
Oerten ant Schwertzager, fre. 200 N Septimb	8	276	DECENDA POSTO		20	\$10,887,05 \$16,4	State of the Contraction of the		\$10,967.03	SOLA P. R. that effective entirely from many part of 1979s between the factorized and distribution for all the following the systems of the factorized to produce it, i.m.y fill, emangery than the entirely Paymon of the First,	Mare to Schoolde St. Live 219	ij

1

_	_	-	_	_	_	_			_							_	_	_	_	_		_	_	_	_	_
*																										
}	1		1	Parties and the same of the sa	H	Paris de la constante de la co	Danies	I	11	P.		Tanana Tanana	1	•		I de la constante de la consta	Approv	Aprilloy Banaga	Metal Activity	Apply A	Assess Name of Street,	Agents of Characters	Pare	Appropri		Activity
	100		Cornect Acadelly or Burnt		Merc to Schools S. Un 270 : March	Now to Schools R. Live 21b	Move to Schwade HA, Live 21 o	Newy Educate Valumbar GOTV Beerl, news to Line 21(b) - m FEA, not public construction	. How to Schedde B. Line 278	Mone to Schoolde B, Lins 21b	Mone to Schwidde B, Line 216	Men is Schedds II. Live 219. No PSA, me public second-lighter	g.	. j	Owner Company	· Gerante Champaign	Owerte Compaign	Ourers Company	Committe Companyon	Counts Congesign	OOTV	GOTV	ALDE	400	. ALDO	G man .
	1		ij	i	a se	įì	Breake B	Schutz 6		Bonds B		1		<del>-</del>												-
			Augh Comments	O. C. (). It is the finance proof that can paid the 10th hadred brink, fraging on Standal 16 or Amin S. (b); Small to report on Standal B. (b) the Standal 15 or Amin S. (b); Small to report to the standard of the standard to	DA.1 (2) Umylithenis yari sipa; Paprisi on Bhacks IVI sa Anytes; Therit in Paprisi on Salaska 316 on service	DALIO, Barrer estant in Karylinean and Prop Marry. Proposal on Debutos IX as Adrik, Chaulton Payspani on Different 27th as commits	D 3.3, Pt. 16-22. In GETV category, determination says that he propriet of high special information and the site, General anticle should be series of the site, General anticle should be to except the series, General on Autoche St. Live Still or 100.	D3.3.P. 28-28; to ODV comprey, Relationment for total maps of control of the cont	D. S. S. Pr. 25-25 is was 10 compay, decommended informed bad T.  State, bad "Langellanum" on the lang commy compage state of the contraction by reference is being to improve on the property of the lange of the la	To Yes a Company of the Company of t	D11.Pt. 14.50 to GDV catgrey pack and match to work, he feel matter to "Amplitudes Table", carry company of matter to "Amplitudes Table", carry company of catherin ty verterant Dates to Amplitude and Schools II, the The and cont to alternate.	D. J. A. 19-70: 1 GOTV compt. Pelached by the blank.  On the first blank compt. The chart services of the compt.  On the chart services of the chart services of the chart services of the chart services of the chart services. The chart services of the chart service	D. J. P., C. M. D. OOTV onlyng Keny Bango Bankon, Dikan M. Daguer Bankon, James Bangon, Bang and San and H. Sankon Sankon, mentel terrapis mentel of desirabel by relationship Sankon be Reported on Sankoh B., Line 316 and mell to district		Var Dengry by good company other	D.3.1 Pr. 11-8: POSIGE Proy Counteralists outstand at WIDCOCCOUNTERS Day Technology on Begin China Magnitude Adult View Domerst Prot Ad is With Disability bids great strappy stanty	Date Pr. 664, New Stry, Restreamed A. Ondy, Van Dates Print At New Toursey, but begands company with	Danner, Philips New Designs in Leaves and Control of the Control o	DAX, Pp. 60-00; Victo Oceanor	- 0.3 A, Pp. Th-40, Yits View Demission Products to GGTV campary. has be Campara Companys Applies.	MORPOWER OF THE PARTY OF T	D.3.3, Pp. 114-13, Manu Birty for Ameligans, descriptions, majer for any of Young Content for making refer half to in View D untagery for an approved to the content of the	DALL P. TO-TT. IN VINE COMPANY SUCTION SHIP TO COMPANY IN COMPANY	D33, Fp. 100-14; Wasserst amazett um fordenter day, in in voter O catagory balls male GOTV	DALP, 1972), in view O compay but described in the last the factor of the papers of th	DIAP, US-18, Tanto wite for a convenient particular
				\$1,000	810,881,54	20.700 E	2	E 346.18	81,288.03	. 800 (ZZ	80	10,577.04	sume	MARCHAN I	92,102,10	878780	87973	8 100	\$1,420,00	2011.05	B10.034 66	8	Marconal .	27.72.23	2	2340,00
۰			Alesation Adulty or Evel	į	10	Aceth 63-04	<b>80</b>	8	1 mm	<b>200</b>	OCTV	ALC:	90TV	, 39 2. M		1			1	ě		0			ĵ	, 00TV
٥			2	Part Manualsing Argument to	1	Admin Philips	0007 AM	Volation Food		GOTV Princing	Takes GOTV	. Bassida	OOTV Plates		PEA - Philade	PES - Print Add	SOLGO FEA - Pure Age	FEA - PRECAME	FEA. Pret Acts	OON PHINE	Totuptum - Barvion	Van Odersch - Podege			PEA. Totaphores	Voter Use
٥	-					ļ	_							i.   		8	8	R				87.08	-	_	_	R
=				80%	S18,9501.64	SE,780.88	8	2	81.28	2000,722	22,191.ED	20.572.44	812,722.4	- 7	S2,102,10	ST07.50	_	8	-	9888	916,654.60		87,888.48	222		\$240.00
3		1	1	L	310,887 E4	St. 790.00	3	20.00	100	8 005/123	8,47.8	## ZEP 2	1898 S12,723.48 S12,723.48		52,102.10	OF DARK	8	8	81,800.00	SE VOCE	910,004 80	5.0	\$ 986,72	27.75	8784	00 0003
-		1	8	ğ	ğ	į	3	<u>_</u> -	Ē	T-T 8630	1	š	-	1	ğ	 ā	1		ā	ĝ	ē	Ē	· <u>ē</u>	Ē	Ě	2
ž		-			Ļ														ļ.	Ļ		_				
,			1	140	Victory 2004 Federal	Today Associ	Venny 2004 Federa	Vectory 2004 Federal	Vectory Federal 8	Votery 2004 Peaters	Į	į	February Assessed		Matery Federal B	Victory Federal 9	Vectory Feature 4	Victory Federal II	Victory Federal	Victory 2004 Federal	Vetery Federal	Venny Federa II	Vetery Pedent	Vesery Federal p	Victory Federal II	Violeny 2004 Pusheral
_			1	1977/00	DECEMBER	108280	10000	<b>SPICO</b>	191708	10 au	10200	969	102501			1042/00	1067300	900	10/12/00	14/106	8	100106	101/00	11/11/06		TOTAL
Ξ			Ą	l	20D18	8	1974.72	8		Î	77.	•	•		1000	80198	i	8		2		P R	S)	22 MB	0010-CR000	11-6380
0	4	+	1		8	ş	4	<u>5</u>	1	-	<b>E</b>		\$	•	486	š	1	<u>\$</u>	\$	1	<u>_</u>	1	1	1		*
	4	1	1	6	Washington	8	1	j	1		i	1	Padi sett Operpla	ו ו			1	į	1	ļ	1	1	į	See al	See and	8
1	4	+		4	_	Pad seg	<u> </u>		$\vdash$	-	<u> </u>	1	<u> </u>			_	_	-	$\vdash$	L	8	_	_	Ļ	-	H
٥		COLUMN TO STREET	1	XON Bepared	BYOM Samewather Bred 1987	120 Blats Ave. 16.	PO Bar agrass	E ply only suffer (EE)	114 IN COMPANY	1 Thursday Bed	1314 E Wassing Lateral	W 1	120 Shares Ave. NE	1,4	110 M JPh Avenue	131E Cheder Aust H Bauts 190	11 E Tappanden Am	MEN Doct it	11 E Toppmann Ave	2075 - 37th Asserte Set	121 & Pulm Conpension (and se 1205	91 S. Jechan	2976 - 37th Assessed 390	18419 Linden Ave N	TO Ber state	PO Ber 200
	Westington Sale Democratic Central Committee	STREET, STORY CANON SECTION	j	both and Schwadenger, he.	Bernation Local	harripean Blyes		Page (See	No Bruss Picting	varide investion is.	Admin't Secu		Noscoci Signs			Culers Magazine	The Polanting	Numbe, Antardo	Phys Publishing	Capital Cay Plans, Inc	Bores Phones Inc.	US Petroder	Spile Chyfhan, fer	Staffe HAY Wheekstein Outwestyn	WA Edynam American	Without County Audier
	age of		3	ž	ž	ž	a	a	å	4	4	á	a	. !	8	4	g	å	å	g	đ	å	g	g	ā	ğ
Y	Washin		1	I	2	Ŧ	2	2	2	2	2	•	2		2	•	2	2	2	2	2	2	2	2	2	2

t

ı

l		
l		
i		
i		
İ		
ĺ		
ı		
İ		
ı		
i		
ľ		

	•		اد			,												1			
Ē	Markey	O Manage upper	Washington State Democratic Central Committee			L	-				ľ	-	-			1		F		-	
Ē		and Chapter	Disciouse of Disturbanest Street Green at the Est Conference	Est Continuos	  -	-	$\mid$	l			f		l								
Ē		1				-	+				t	H	f								
Ė	1	3 ]	1	Address	8	1	4	ŀ	The American	1	1			-	Warner Addition	Erry Arrest	Anti Cananata	1	Cornet Activity or Brest	Į	
		á	Day Churty Recents and Elections			1	2		Matery 2004 Pesteral		â	812.80	Ī	\$12.50 Value Like	Alg.	977 60	DOLAN, GARRISTON BOOK CANONY C	J	Veer Co	Arguna Argenta	
R	2	g	lechit day	422 178h B 8W	]	1	in a	-: * 101.04	Victory 2009 Periors		. 8	812.80	812.60	est the		812.60	DAS, Pr. 94-68, Terraction has remain thing Disage counts on Business, in OCYV Congrey, when the described in West ID and hast ordere absent to in West ID	18	G Japan		
Ē	2	4	Lagest and Chearty fro	111 East Medican & Same 117	1	*	<b>27129</b>	N spends	Wodery 2004 Pederal		8	90 000 95	88,000.08	OmmatergOOTV		OD COOC! 18	D.3.1.P. 100-100, in GOTV subgery, and considera for spiecific and consecution should be blown D		Weer ID	Addito	
- 1	•	A	Serve Proces Inc.	U1 8 Pein Carpes Dhe 9205	**************************************		3	» seeine	Victory 2004 Federal		į.	STABLES STABLES	170,001,28	OOTV Tempering		B.2840	O. 1.1, P., of the traction between payments to two exclusion. This is provided by the control of the control o	1 c	Veter ID	II	
£	9	4	Application and Lates	2500 116th Ave HE	1	WA	MODE	10/00/01	Victory 2004 Federal		1707	STOCKS	82,547.28	Marie Uni	£3,7600	\$1247.20	DAALP, 100-104, New File Committee' in COTY eatgroup, took in		Q AND	Append .	
Ŗ	2	4	Barra Physics Inc.	121 8 Peln Cenyen Ohn sidd	1	\$	1	102000 N	Metery 2004 February		1	0.00.00	82,342,50	GOTV Telephoring		00 7285 738	D.S.J., Pp. 144-178; Using a Puny Commission COOP opposite St. MINISTER ST. Commission Conf. Plant. Standard opposite St. Processive D. Call 1920 Of 11, 198, may in COOP compay but view Operator.	<u> </u>	Veter O	Age of the last	
P	2 12			Cars Beed		15	100	N 10/8/201	Watery Federal B		811	OF NO.	80 925	Water Like	1	L[	DAX Py CO.D. The SOTY magery and papers to transfer of transfer to the sound to Mark D. The S	<u> </u>	G SAN	April 1	
Ë	ا	۱,		. 1		•	1				-		- Contract	•	· i		THE PARTY OF THE P	-	4	 	
R	•	A	The Manhauman Wildelle	100 West Marry Awares		. 3	1	\$ 5	Watery 2004 Federal		2	8	8000	CON ALE	ALGO	\$200.00	DAAL Pa, STAR, or GOTV company to on all for a resolution store expression of company or demants. The star has Reported on two SR.	Links B.	Move to Schoolsh B. Lies 29	ij	
F	•	8	Martin Luther (Bog Controlles	722 10th Aug	***	Yes	09122	W COODIO	Velory 2002 Federal	Tão	1360	8800.00	80000	Carthan Building Suant	No Allegation	8360.00	O.S.L.Pp. 1-2 between posters described in the section of a		Amended		
8	•	5 8	Land American Street Towns Tow	No. of Contract of		<u>.</u>	900.00	COLLOR	Second America	8	8	00 9888	80 SEES	Country Bulling Sunt	No America	NAME OF	15 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	-	Amenda	] [-	
	1			British Company of the Company of th	H	<u> </u>	+		A Paris		#			1	SC 76		THE PART OF THE PARTY.	1			

# **EXHIBIT 2**

7	_	т,		-	-					_		<del></del>		T	٦
		$\prod$			·	97.00		***************************************						$\prod$	
								*250	MER			80074			
I	T							43.77.49	W.DE.R			8	3	$\ $	
ŀ	ł	H	- 5	-	117,772,00	20,720,00	13.00	200	Kors	36,00.44	1			$\parallel$	
ł	+	$\parallel$	$\dashv$	_	4					Н				H	1
			Part Andres	1985 Serv. contributed also and Viberian Service Mar	SOTA Kery Walnum Compatible	Dit day, black Dang life, Sh. grapt Debl					Market Barrel				
-	$\int$	Щ	-		-	1	111	1	11	-			1		_
			ij	1	1	1	1	1		1	1	1		Щ	-
			J	ال الواقعية والتشويلات المناجعة الواقعية والتواقع والتواقع والتواقع والتواقع والتواقع والتواقع والتواقع والتو والتقد الإنهاج والمناجعة والتواقع التناجعة والتواقع والتحاق والتقديم والتواقع والتفاق والتواقع والتواقع والتفا إن الا الأنهاء إلى إن التقديم من سياسات والتواقع والتواقع والتواقع والتواقع والتواقع والتواقع والتواقع والتواق	and the state of females and the state of th	ان پرواندوم در پرومزم و ده که پرواندوم و پایشندوم و به برخوموم و برخوم و برخوم و برخوموم و برخوم	25.5 P. 70.5.5 P. P. S. Remain months of the first through the second of		MATERIAL CONTRACTOR CO	Dal, Tr. Bate 600V chang Tany Persons and Could in Particles Desirable in an interneting lands in					
					0417,7110	95 Jan 50	845		i	****	84.CM,16	- ergelta	PROTECTION		
•				ı	į.	1	1	1	1	ĕ		<b>!</b> ·			
•			įį			1	ij	ij	È	ğ	ALIGN	Ž.	à l	I	
			ļ	1		11	FR. Pater	. Peter			GTV Pickey	OTV TAME	COTY Takenda	(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)	
1	1	1	]]		SECTION SECTION	or our /m		1		838/438/40	BIABLE SCTV PARTY	2			
•			1]	2.101.38	Bert,770.88	ar mai de		1	1000 ma	\$30,433.As	1	7 (a) (b)			
7			1	5	5	5	Ē	<b>6</b> ·	5	\$	ŧ	i	ī		ĺ
		ed on the Wheel	1	Actory Permuses	Shary Palmal	Manny Patenti	Serry Patent	Many Polent I	Menny Patent &	Victory Potenti	100 100	Wany 200 Palent			
9	Court State	Schoolste of Independent Expenditures Declose	1		A48 Campanana In	1	24 (marriage) pr	MM Commission, b.,		Patern County County	THE CONTRACTOR OF	T COLOR		Character for the Charles Line 30 bet death to	
-	Section Section		3		4	A	4	4		4	*		4	$\parallel$	
•		1	Ļ	<u> </u>		*	*	2	2	2		2	2 ,	=	
			•		•								<u> </u>		

. .

## **EXHIBIT 3**

### BEFORE THE FEDERAL ELECTION COMMISSION

IN RE	<u> </u>
Washington Democratic Party	)
•	~ }

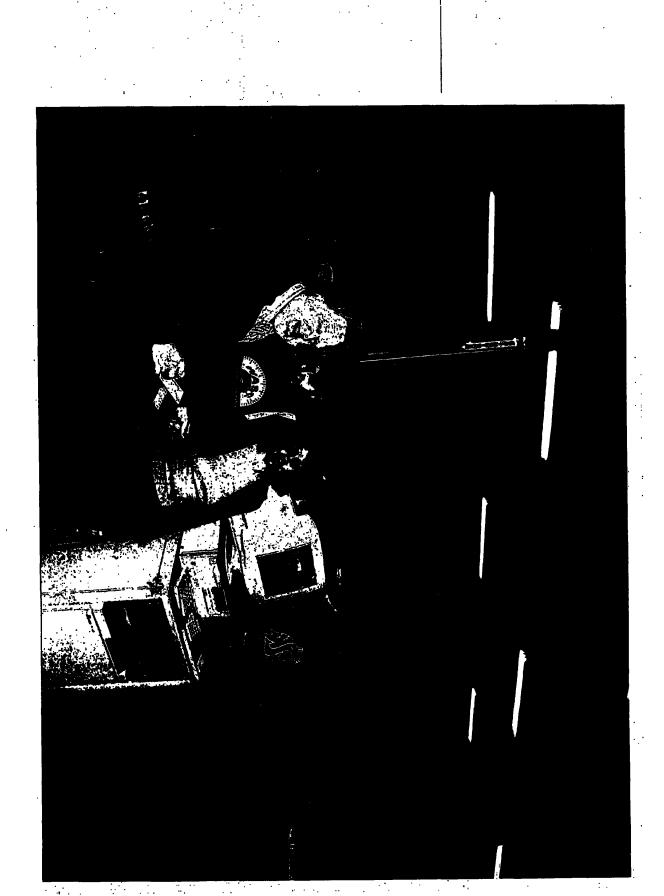
### **DECLARATION OF MICHAEL KING**

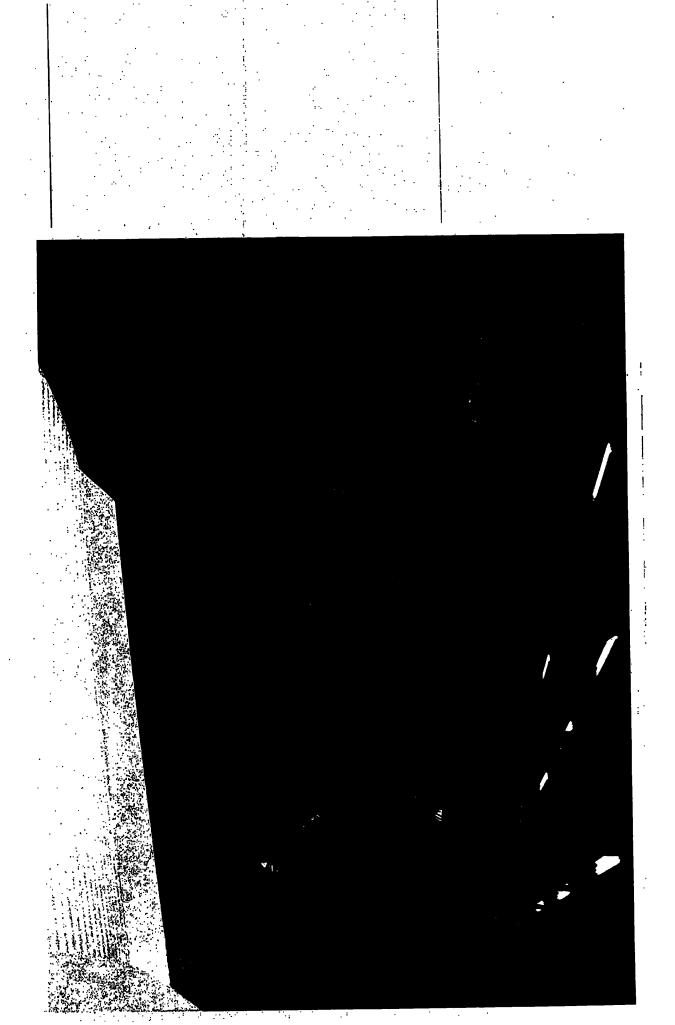
- During the 2004 general election campaign I served as a regional field director for the Patty Murray for U.S. Senate. In that capacity, I supervised the production and distribution, by volunteers, of a mail place entitled "Extreme" in October 2004.
- In that regard, I was responsible for the oversight of Washington Democratic Party volunteers who were assisting in the production of this mailing.
- Due to the fact that the mailing occurred almost five years ago, I cannot recall the exact particulars of what each volunteer did. However, I can recall, generally, that the volunteers played unextensive role in the preparation of this mailing.

I declare under ponalties of perjury that the foregoing is true and correct to the best of tny present knowledge, information and belief. Dated this 15th day of April, 2009.

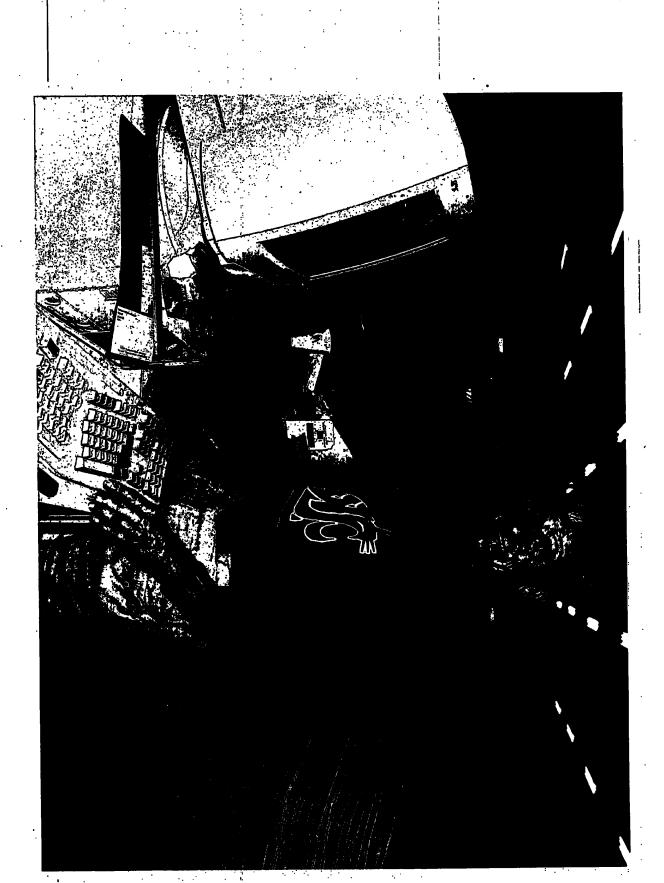
Michael King











¦: .







:

