

FILED

SEP 24 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

SEIU 775; AND SEIU 775
QUALITY CARE COMMITTEE,

Defendants.

NO. 15-2-01825-3
SUMMONS

THE STATE OF WASHINGTON SENDS GREETINGS TO:

SEIU 775;
AND SEIU 775 QUALITY CARE COMMITTEE,

A lawsuit has been started against you in the Thurston County Superior Court by the plaintiff above named. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense(s) in writing, and serve a copy upon the undersigned attorney for the plaintiff within 20 days after service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. If you serve a notice

1 of appearance on the undersigned attorney, you are entitled to notice before a default
2 judgment may be entered.

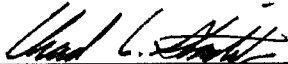
3 You may demand that the plaintiff file this lawsuit with the court. If you do so,
4 the demand must be in writing and must be served upon the plaintiff. Within 14 days
5 after you serve the demand, the plaintiff must file this lawsuit with the court, or the
6 service on you of this summons and complaint will be void.

7 If you wish to seek the advice of an attorney in this matter, you should do so
8 promptly so that your written response, if any, may be served on time.

9 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
10 the State of Washington.

11 DATED this 24th day of September, 2015.

12 ROBERT W. FERGUSON
13 Attorney General

14 
15 CHAD STANDIFER, WSBA No. 29724
16 Assistant Attorney General
17 LINDA A. DALTON, WSBA No. 15467
18 Senior Assistant Attorney General
19 Attorneys for Plaintiff State of Washington
20
21
22
23
24
25
26

FILED

SEP 24 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

SEIU 775; AND SEIU 775
QUALITY CARE COMMITTEE,

Defendants.

NO. 15-2-01825-3

COMPLAINT FOR CIVIL
PENALTIES AND FOR
INJUNCTIVE RELIEF FOR
VIOLATIONS OF
RCW 42.17/RCW 42.17A

I. NATURE OF ACTION

The State of Washington ("State") brings this action to enforce the state's campaign finance disclosure law, RCW 42.17A and its predecessor, RCW 42.17¹. The State alleges that Defendants SEIU 775 and SEIU 775 QUALITY CARE COMMITTEE (SEIU 775 PAC) violated provisions of RCW 42.17 and RCW 42.17A by failing to properly report in-kind and/or monetary contributions from SEIU 775 to SEIU 775 PAC. The State seeks relief under RCW 42.17A.750 and .765, including penalties, costs and fees, and injunctive relief.

¹ The State's campaign finance disclosure laws, formerly located at RCW 42.17, were recodified effective January 2012 to RCW 42.17A. The alleged violations span time where both statutes were in effect; for clarity purposes, Plaintiff will be referring to the current version of the statute when setting out its alleged statutory violations.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

II. PARTIES

1.1 Plaintiff is the State of Washington. Acting through the Washington State Public Disclosure Commission, Attorney General, or local prosecuting attorney, the State enforces the state campaign finance disclosure laws contained in RCW 42.17A and RCW 42.17.

1.2 Defendant SEIU 775, formerly known during relevant time periods as SERVICE EMPLOYEES INTERNATIONAL UNION HEALTHCARE 775NW, is a local union affiliate of the Service Employee International Union, a nationwide union which represents millions of public service workers, nurses, hospital staff, nursing home care providers, building services and security guards.

1.3 Defendant SEIU 775 QUALITY CARE COMMITTEE (SEIU 775 PAC) filed and registered with the Commission as a continuing political committee on August 14, 2009. SEIU 775 PAC filed using the name "SEIU Healthcare 775NW Quality Care Committee". SEIU 775 PAC subsequently amended its registration on December 3, 2014 using the name to "SEIU 775 Quality Care Committee".

III. JURISDICTION AND VENUE

2.1 This Court has subject matter jurisdiction over Defendants, in accordance with RCW 42.17A. The Attorney General has authority to bring this action pursuant to RCW 42.17A.765.

2.2 Defendants' actions which form the basis for the violations alleged below occurred in whole or in part, in Thurston County, Washington.

2.3 Venue is proper in this Court pursuant to RCW 4.12.

1 compensation from SEIU 775. It is reported that in 2014, SEIU 775 paid a salary of
2 \$131,318 to Mr. Glickman, \$183,237 to Mr. Rolf, and \$120,404 to Mr. Harders. Upon
3 information and belief, the compensation paid these individuals by SEIU 775 included
4 for their work on behalf of SEIU 775 PAC.

5 3.5 A review of SEIU 775 PAC's expenditure reports do not identify
6 payments to any person as defined by RCW 42.17A.005(35) for services to support its
7 activities. Based on SEIU 775 PAC's reported activities, the services provided by
8 Messrs. Glickman, Rolf, and Harders, as well as potentially other SEIU 775 staff
9 members, to support SEIU 775 PAC's activities exceeded \$110 per month during the
10 period September 23, 2010 through September 23, 2015, and should have been reported
11 by SEIU 775 PAC as in-kind contributions.

12 3.6 SEIU 775 also should have disclosed on lobbying disclosure reports filed
13 by it or on its behalf, the value of services performed by SEIU 775 staff on SEIU 775
14 PAC's behalf, in accordance with state disclosure requirements.

15 3.7 In addition to the SEIU 775 staff time that should have been reported by
16 both SEIU 775 and SEIU 775 PAC, SEIU 775 PAC received and failed to report in-
17 kind contributions from SEIU 775 for its portion of the costs associated with SEIU 775
18 providing SEIU 775 PAC office space, postal and web services, and telephones.

19 3.8 SEIU 775 PAC reported receipt of cash contributions from SEIU 775
20 totaling \$1,389,251.66 between September 23, 2010 and September 23, 2015, as
21 follows: \$175,000 (for January 1, 2015 through September 23, 2015); \$20,000 (for the
22 calendar year 2014), \$307,486.66 (for the calendar year 2013), \$808,265 (for the
23 calendar year 2012), \$10,000 (for the calendar year 2011), and \$68,500 (for September
24 23, 2010 through December 31, 2010).

