

FILED

OCT 13 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

SUPERIOR COURT OF WASHINGTON FOR THURSTON COUNTY	
_____	Plaintiff/Petitioner,
vs.	
_____	Defendant/Respondent.

NO. 15-2-01923-3

NOTICE OF ASSIGNMENT and (NTAS)
NOTICE OF TRIAL SCHEDULING DATE

TO: THURSTON COUNTY CLERK
ATTORNEYS/LITIGANTS

PLEASE TAKE NOTICE:

1. This case is assigned to: **The Honorable Erik Price**
2. The trial scheduling date for this case is: **February 12, 2016.**

Do not come to court on the trial scheduling date. Do not call or e-mail the court.
Instead, file a scheduling questionnaire and serve it on the other parties. The questionnaire is attached to this notice. Review Local Court Rule 40 for more information about scheduling.

3. **Plaintiff/Petitioner:** You must serve both this notice and a blank scheduling questionnaire by 5 p.m. on January 29, 2016. If there is no proof of service, the court will not issue a case schedule order. Your deadline for filing and serving a completed scheduling questionnaire is February 05, 2016 at 5 p.m.
4. **All Other Parties:** You must file and serve a completed trial setting questionnaire by February 10, 2016 at noon. Joint submissions by both parties are also accepted on this date.
5. Failure to timely submit a scheduling questionnaire shall not be grounds to delay issuing a case schedule order, and it shall not be grounds to continue the trial unless good cause is demonstrated.
6. The court will not issue a case schedule order unless the case is ready to be scheduled. "Readiness" for scheduling is explained in Local Court Rule 40, which is available on the court's web site and law libraries.
7. Parties can obtain an earlier trial scheduling date by filing and serving a notice of issue form.

Dated this 13th day of October, 2015.

Thurston County Superior Court
2000 Lakeridge Drive SW, Building Two
Olympia, Washington 98502
(360) 786-5430

NOTICE OF ASSIGNMENT and
NOTICE OF SCHEDULING CONFERENCE

Copy Received

Clerk's Stamp

SUPERIOR COURT OF WASHINGTON IN AND FOR THURSTON COUNTY
--

NO. 15-2-01923-3

SCHEDULING QUESTIONNAIRE SUBMITTED BY:

Plaintiff/Petitioner

Plaintiff / Petitioner DUE: February 05, 2016

vs.

Defendent/Respondent DUE: February 10, 2016

Defendant/Respondent.

Joint Submission or Other Party:

DUE: February 10, 2016

See Local Court Rule 40 to learn how the court schedules cases.

1. What is the trial scheduling date for this case? _____
2. Who is the assigned judge? _____
3. What type of case is this (for example, contract, tort)? _____
4. Will this be a [] bench trial or [] jury trial? (You must file a jury demand separately.)
5. How long do you estimate the trial will take?: _____ hours **or** _____ days.
6. When do you anticipate this case will be ready for trial? _____
7. When are you **unavailable** for trial in the next 24 months?
_____ (attach another sheet if necessary)
8. Is this case subject to mandatory arbitration? [] Yes [] No [] Don't know
9. Is this case subject to mandatory expedited review, was your trial already scheduled and then continued, or does it require special management by the judge? [] No [] Yes (explain):

Date: _____

SIGNED/Bar No: _____

SIGNED/Bar No: _____

Name: _____

Name: _____

Address: _____

Address: _____

Telephone No: _____

Telephone No: _____

E-mail Address: _____

E-mail Address: _____

SCHEDULING QUESTIONNAIRE

Thurston County Superior Court
 2000 Lakeridge Drive SW, Building Two
 Olympia, Washington 98502
 (360) 786-5430

FILED

OCT 13 2015

Superior Court
Linda Myhre Enlow
Thurston County Clerk

**STATE OF WASHINGTON
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

SERVICE EMPLOYEES
INTERNATIONAL UNION LOCAL
925; AND SEIU LOCAL 925
PUBLIC SERVICE PAC,

Defendants.

NO.

SUMMONS

15-2-01923-3

THE STATE OF WASHINGTON SENDS GREETINGS TO:

SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 925,
AND SEIU LOCAL 925 PUBLIC SERVICE PAC

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

COPY

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

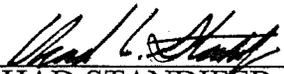
3 You may demand that the plaintiff file this lawsuit with the court. If you do so,
4 the demand must be in writing and must be served upon the plaintiff. Within 14 days
5 after you serve the demand, the plaintiff must file this lawsuit with the court, or the
6 service on you of this summons and complaint 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 13th day of October, 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

1 in-kind and/or monetary contributions. The State seeks relief under RCW 42.17A.750
2 and .765, including penalties, costs and fees, and injunctive relief.

3 **II. PARTIES**

4 1.1 Plaintiff is the State of Washington. Acting through the Washington State
5 Public Disclosure Commission, Attorney General, or local prosecuting attorney, the
6 State enforces the state campaign finance disclosure laws contained in RCW 42.17A
7 and RCW 42.17.

8 1.2 Defendant SEIU 925 is a local union affiliate of the Service Employee
9 International Union, a nationwide union which represents millions of public service
10 workers, nurses, hospital staff, nursing home care providers, building services and
11 security guards.

12 1.3 Defendant SEIU 925 PAC filed and registered with the Commission as a
13 continuing political committee on October 8, 2002. SEIU 925 PAC originally filed
14 using the name Service Employees International Union Local 925. SEIU 925 PAC
15 subsequently amended its registration on March 29, 2012, changing its name to Service
16 Employees International Union Local 925 PAC.

17 **III. JURISDICTION AND VENUE**

18 2.1 This Court has subject matter jurisdiction over Defendants, in accordance
19 with RCW 42.17A. The Attorney General has authority to bring this action pursuant to
20 RCW 42.17A.765.

21 2.2 Defendants' actions which form the basis for the violations alleged below
22 occurred in whole or in part, in Thurston County, Washington.

23 2.3 Venue is proper in this Court pursuant to RCW 4.12.
24
25
26

1 3.5 SEIU 925 PAC reported receipt of contributions from SEIU 925 totaling
2 \$392,827.16 between October 13, 2010 and October 13, 2015, as follows: \$0 (for
3 January 1, 2015 through October 13, 2015); \$136,767.18 (for the calendar year 2014);
4 \$0 (for the calendar year 2013); \$255,710.50 (for the calendar year 2012); \$349.48 (for
5 the calendar year 2011); and \$0 (for October 13, 2010 through December 31, 2010).

6 3.6 SEIU 925, as an employer of lobbyists, was required to report the value
7 of contributions to the Commission on L-3 or L-3c reports or have its lobbyist report
8 the value of contributions on their L-2 reports. SEIU 925 failed to properly report, in
9 accordance with RCW 42.17A.630(2), the total value of monetary contributions it made
10 to SEIU 925 PAC and other individuals and political committees. Of the total
11 contributions (\$1,467,900.47) made by SEIU 925, \$832,744.43 were reported by its
12 lobbyist on L-2 reports. However, a total of \$635,156.04 in contributions was not
13 reported by SEIU 925 on either its lobbyist's L-2 reports, or its own L-3 or L-3c
14 reports, depending on the timing of their contribution. To the extent such contributions
15 exceeded \$110 in any month during the period October 13, 2010 through October 13,
16 2015, SEIU 925 should have reported them as contributions in either its lobbyist's L-2
17 reports, or its own L-3 or L-3c reports, depending on the timing of their contribution.

18 3.7 In-Kind Contributions: Based on SEIU 925 PAC's committee
19 registration forms, during the relevant time period, Adair Dammann and Karen Hart
20 were the committee officers for SEIU 925 PAC. Additionally, during the same time
21 period, these individuals were employed by SEIU 925 and received compensation from
22 SEIU 925. SEIU 925 reported that, in 2014, it paid a salary of \$88,590 to
23 Mr. Dammann, and \$93,416 to Ms. Hart. Upon information and belief, the
24 compensation paid these individuals by SEIU 925 included for their work on behalf of
25 SEIU 925 PAC.
26

1 3.8 A review of SEIU 925 PAC's expenditure reports do not identify
2 payments to any person as defined by RCW 42.17A.005(35) for services to support its
3 activities. Based on SEIU 925 PAC's reported activities, the services provided by
4 Mr. Dammann and Ms. Hart, as well as potentially other SEIU 925 staff members, to
5 support SEIU 925 PAC's activities that exceeded \$110 during any month for the period
6 October 13, 2010 through October 13, 2015, should have been reported by SEIU 925
7 PAC as in-kind contributions.

8 3.9 In addition, SEIU 925 failed to report, in accordance with
9 RCW 42.17A.630(2), the value of services performed by its staff for SEIU 925 PAC
10 and other political committees. SEIU 925 should have reported the value of the
11 services on either its lobbyist's L-2 form or its own L-3 or L-3c forms.

12 3.10 In addition to the SEIU 925 staff time that should have been reported by
13 both SEIU 925 and SEIU 925 PAC, both SEIU 925 and SEIU 925 PAC failed to report
14 in-kind contributions from SEIU 925 for its portion of the costs associated with
15 SEIU 925 providing SEIU 925 PAC office space, postal and web services, and
16 telephones.

17 V. CLAIMS

18 The State re-alleges and incorporates by reference all the factual allegations
19 contained in the preceding paragraphs, and based on those allegations, makes the
20 following claims:

21 4.1 First Claim: The State reasserts the factual allegations made above and
22 further asserts that Defendant SEIU 925, in violation of RCW 42.17A.630(2), failed to
23 report monetary and in-kind contributions, aggregating more than \$110 in a calendar
24 month, to SEIU 925 PAC and other individuals and political committees during the
25 period of time October 13, 2010 and October 13, 2015.
26

1 4.2 Second Claim: Plaintiff reasserts the factual allegations made above and
2 further asserts that Defendant SEIU 925 PAC, in violation of RCW 42.17A.235 and
3 .240, failed to properly and timely file reports of in-kind contributions it received from
4 SEIU 925 to support SEIU 925 PAC activities.

5 **VI. REQUEST FOR RELIEF**

6 WHEREFORE, the State requests the following relief as provided by statute:

7 5.1 For such remedies as the court may deem appropriate under
8 RCW 42.17A.750, including but not limited to imposition of a civil penalty, all to be
9 determined at trial;

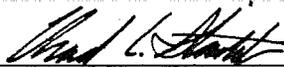
10 5.2 For all costs of investigation and trial, including reasonable attorneys
11 fees, as authorized by RCW 42.17A.765(5);

12 5.3 For temporary and permanent injunctive relief, as authorized by
13 RCW 42.17A.750 (1)(h); and

14 5.4 For such other legal and equitable relief as this Court deems appropriate.

15 DATED this 13th day of October, 2015.

16 ROBERT W. FERGUSON
17 Attorney General

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