

In regards to a complaint filed against the Larry Spencer for violations of the Sunshine Law for the following report.

http://www.kcgov.us/elections/candidates/data/2012_Primary/Commissioner_Dist_3_Spencer_Larry/7_Day_Pre_Primary-Spencer.pdf

The following information supports that complaint.

Idaho code specifies a limit of \$1000 per contributor. Idaho Code 67-6610A also specifies:

- 6(c) Two (2) or more entities are treated as a single entity if the entities:
- (i) Share the majority of members on their board of directors;
 - (ii) Share two (2) or more officers;
 - (iii) Are owned or controlled by the same majority shareholder or shareholders or persons;
 - (iv) Are in a parent-subsidiary relationship; or
 - (v) Have bylaws so stating.

The Spencer campaign is making an attempt to subvert contribution limits in Idaho law by funneling contributions from one or more entities through various corporations those same entities control. Actions consistent with this behavior would also suggest that contributions from family members, entity employees, and unknown persons were also pass-through contributions from the single entity source, in violation of law.

Most of the suspect contributions are reported from entities with the same address. - P.O. Box 30009, Spokane WA 99223, (a corporate Post Office box for various controlled businesses) and contributed on the same day (3/31/12) possibly indicating a single source entity, a single account, a single payment check and/or a single signatory. Another address shared by various contributors and controlled businesses is P.O. Box 1570, Post Falls ID 83877 also suggesting a single source entity.

The suspect contributions are:

Since the maximum contributors below are majority stockholders, majority directors, or more than two officers of the following corporate contributors, it is prima facie evidence that at least 5 contributions totaling \$5000 to the Larry Spencer campaign are violations of the contribution limits.

Benjamin Swartout \$ 1000 - Director at SUNBIRD TECHNOLOGIES, INC; 57TH GEM CLEAN, INC; RIVERSIDE DEVELOPMENT COMPANY; and COEUR D'ALENE DEVELOPMENT COMPANY

Dennis Swartout \$1000 - Director at SUNBIRD TECHNOLOGIES, INC; RIVERSIDE DEVELOPMENT COMPANY; and COEUR D'ALENE DEVELOPMENT COMPANY

Joseph Wasicek \$1000 - Director at SUNBIRD TECHNOLOGIES, INC; and 57TH GEM CLEAN, INC;

Jon Patrick Swartout \$1000 - Director at RIVERSIDE DEVELOPMENT COMPANY;
and COEUR D'ALENE DEVELOPMENT COMPANY

Ronnie Warmington a.k.a Rhonda K Warmington \$1000 - Manager of RILEY &
RITTER CONSTRUCTION CO., LTD of which Ben Swartout is the Registered Agent
and possible stockholder and owner of AVAILABLE RENTALS

SUNBIRD TECHNOLOGIES, INC. \$1000- (Since three directors and majority of the
Board above have donated the maximum this contribution is illegal)

57TH GEM CLEAN, INC. \$1000- (Since two directors and majority of the Board have
donated the maximum this contribution is illegal)

COEUR D'ALENE DEVELOPMENT COMPANY \$1000- (Since three directors and
majority of the Board have donated the maximum this contribution is illegal)

RIVERSIDE DEVELOPMENT COMPANY \$1000- (Since three directors and majority
of the Board have donated the maximum this contribution is illegal)

AVAILABLE RENTALS \$1000 - (Since registered owner above has donated the
maximum this contribution is illegal)

The suspect contributions below are reported from family members of the owners and corporate
officers above and may be only be pass-through contributions from a single source.

Kyong Swartout - \$1000, donated 3/31 and listed at the same corporate P.O. Box

Kyong Jacobson- \$1000, listed at the same corporate P.O. Box

Kali Warmington- \$1000 donated 3/31

Robert Warmington - \$1000

Angela Swartout - \$1000, listed at the same corporate P.O. Box

Mila Wasicek - \$1000 listed at the same corporate P.O. Box

Two suspect contributions are from unverifiable names:

S.S. Budbill- \$1000 Although address given is the same Spokane Post Office Box, a
directory search found no person living in Spokane by that name and the only person
found nationally was Shannon Shere Budbill (nee Wallace) from Bothell Washington.
This contributor should be verified for authenticity to ensure it is not fictitious.

F.E. Felson - \$1000 Although address given is the same Spokane Post Office Box, a directory search found no person living in Spokane or the United States by that name. This contributor should be verified for authenticity to ensure it is not fictitious.

Conclusion:

There is prima facie evidence that this is a scheme for one or more persons to violate contributions limits and to hide those violations by attributing contributions to controlled corporations and other real or fictitious persons

There should be an immediate investigation by the Kootenai County Clerk's Office and Prosecutors Office into this obvious illegal activity and possible criminal conspiracy to violate Idaho law.

These links below show that the various entities contributing to Larry Spencer violate the contribution limits. These corporate filings show contributors share two or more directors or majority ownership and are utilized to hide donations from one entity in excess of \$1000, an intentional violation of law.

SUNBIRD TECHNOLOGIES, INC. (Address: P.O. Box 30009 Spokane WA 99223)
http://www.sos.wa.gov/corps/search_detail.aspx?ubi=602537471

57TH GEM CLEAN, INC. (Address: P.O. Box 30009 Spokane WA 99223)
http://www.sos.wa.gov/corps/search_detail.aspx?ubi=602544332

COEUR D'ALENE DEVELOPMENT COMPANY (Address P.O. Box 1570, Post Falls ID 1570)
http://www.sos.idaho.gov/servlet/TransformXMLDoc?URL=\20120510\XMLPORTS_12131684.xml

RIVERSIDE DEVELOPMENT COMPANY (Address: P.O. Box 30009 Spokane WA 99223)
http://www.sos.idaho.gov/servlet/TransformXMLDoc?URL=\20120313\XMLPORTS_12073236.xml

AVAILABLE RENTALS a.k.a. Kootenai County Rentals and Management (Address P.O. Box 1570, Post Falls ID 1570)
[http://www.sos.idaho.gov/tiffpilot/tiffpilot.exe?FN=\\sosimg\corp\\$\20080805\ASSUM_AM08218102730.tif](http://www.sos.idaho.gov/tiffpilot/tiffpilot.exe?FN=\\sosimg\corp$\20080805\ASSUM_AM08218102730.tif)
[http://www.sos.idaho.gov/tiffpilot/tiffpilot.exe?FN=\\sosimg\corp\\$\20110826\ASSUM_ORI1238100654.tif](http://www.sos.idaho.gov/tiffpilot/tiffpilot.exe?FN=\\sosimg\corp$\20110826\ASSUM_ORI1238100654.tif)

The following entities shows business relationships between various contributors

SHIP CANAL COMPANY (Address: P.O. Box 30009 Spokane WA 99223)
http://www.sos.wa.gov/corps/search_detail.aspx?ubi=601426592

SWARTOUT FAMILY INVESTMENTS LLC (Address: P.O. Box 30009 Spokane WA 99223)

http://www.sos.wa.gov/corps/search_detail.aspx?ubi=602951080

REGAL CLEAN, INC. (Address: P.O. Box 30009 Spokane WA 99223)

http://www.sos.wa.gov/corps/search_detail.aspx?ubi=602082279

RILEY & RITTER CONSTRUCTION CO., LTD. (Address: P.O. Box 30009 Spokane WA 99223)

http://www.sos.wa.gov/corps/search_detail.aspx?ubi=601284962