



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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April 28, 2017

Sent electronically to Carolyn Crain "hazel_x2@comcast.net"

Subject: Complaint filed against Eric Holt: PDC Case 9445

Ms. Crain:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 22, 2016. Your complaint alleged that Eric Holt, a candidate seeking the office of State Senator from the 18th legislative District in 2016, violated RCW 42.17A.235 and RCW 42.17A.240 by failing to file Summary Campaign Contribution and Expenditure reports (C-4 reports) as required for a candidate under the Full Reporting option.

Specifically, you alleged that the Eric Holt for State Senator Campaign (Campaign) failed to disclose expenditures for large campaign signs that had recently been placed in and around the 18th Legislative District, and a direct mail piece. PDC staff reviewed your allegations in light of PDC laws and rules in order to determine whether a formal investigation or enforcement action is warranted.

PDC staff reviewed your complaint, the PDC contribution and expenditure database for Eric Holt, the Summary Full Campaign Contribution and Expenditure reports (C-4 reports) filed by the Campaign, and the response letter from Mr. Holt. Based on staff's review, we found the following:

- On May 16, 2016, Eric Holt filed a Candidate Registration (C-1 report) declaring his candidacy for State Senator from the 18th legislative District in 2016, and selecting the Full Reporting option.
- Mr. Holt was a first-time candidate for office in 2016.
- On November 3, 2016, the Campaign filed the 21-day and 7-day Pre-General Election C-4 reports, disclosing expenditures for the yard signs and direct mail piece listed in our complaint.
- Mr. Holt stated that he was a first-time candidate, new to PDC and the reporting requirements, in addition to the Online Reporting of Campaign Activities (ORCA) software. He stated that he initially had a volunteer acting as his Campaign treasurer, which he knew was only on a temporary basis, and that individual needed to return to work and took over the PDC reporting in July/August of 2016.

- Mr. Holt stated that he was entering Campaign contribution and expenditure information every week into ORCA, and acknowledged that he did not enter his Campaign expenditures correctly. He stated that after he had been notified by PDC staff of your complaint on November 3, 2016, he contacted staff about filing the missing C-4 reports and disclosing the expenditures listed in your complaint.
- Mr. Holt stated that he filed the missing 21-day and 7-day Pre-General Election C-4 reports on November 3, 2016, the same day he contacted PDC staff. He apologized for the late filed reports and any confusion that this issue might have caused. He went on to state that *"I assure you that I did not mean to violate the law or try to manipulate the system to mislead anyone."*

While the initial 21-day Pre-General Election C-4 report was filed 15 days late, and 7-day Pre-General Election C-4 reports was filed two days late, the information contained on the two C-4 reports was disclosed five days prior to the November 8, 2016 general election being held. PDC staff would note that Mr. Holt was a first-time candidate for public office, and that the late filed reports were the result of inexperience on behalf of Mr. Holt acting as his own Treasurer, as opposed to any intent on his part.

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaints or pursuing enforcement action in this instance. However, PDC staff is warning Mr. Holt about the importance of timely filing campaign reports disclosing contribution and expenditure information, especially right before an election, and recommending that if he is a candidate in the future, to seek out an experienced campaign Treasurer to assist him in complying with the PDC reporting requirements.

The warning letter notified Mr. Holt that if there are any future violations of PDC laws or rules found against him, the Commission will consider the warning in deciding on any further Commission action.

If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,


Kurt Young
PDC Compliance Officer

Endorsed by:


Evelyn Fielding Lopez
Executive Director

cc: Eric Holt