



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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February 6, 2017

Sent electronically to Linda Simpson "linda.simpson@hotmail.com"

Subject: October 19, 2016 Complaint filed against the Kitsap County Republican Party,  
PDC Case 8633

Ms. Simpson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 4, 2016. Your complaint alleged that the Kitsap County Republican Party (KCRP), a bona fide county political party organization registered with the PDC, violated RCW 42.17A.235 and .240 by failing to properly report expenditures that were reimbursed to a KCRP official in 2015.

Specifically, your complaint alleged that Chris Tibbs, former Chair of the KCRP, received payments on multiple occasions during the period January 1 to July 31, 2015, reimbursing him for gas, mileage and meals, and then the KCRP filed amended reports re-classifying some of the expenditures and listing the original vendors. 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.

Staff reviewed your complaint, the Campaign Summary Contribution and Expenditure Reports (C-4 reports) and subsequent amended C-4 reports filed by KCRP, and the response filed by Chris Stephens, Treasurer for the KCRP. Your allegations concerning how the KCRP spent their funds, the services performed by Mr. Tibbs for the KCRP, his contracting work outside of his role as Chairman of the KCRP, and his qualifications to hold elective were not investigated. Based on staff's review, we found that:

- According to the Committee Registrations (C-1pc report) filed by the KCRP, Chris Tibbs served as Chairman of the KCRP from 2013 through May of 2016, when he was replaced by Heather George who was listed as Acting Chair.
- PDC staff's review of the C-4 report found that KCRP officials were reimbursed on a monthly basis on the Schedule A to C-4 reports dating back to January of 2013.
- While the majority of reimbursements were made to Mr. Tibbs, staff found that Heather George, Chris Hixson, Chris Ferguson, Brenda Petrick, Faye Henden, Margie Perry, Janet Stump, Rand Hein, Alice Tawresey, and Tony Stephens all were reimbursed for out-of-pocket expenses during Mr. Tibbs time as Chair of the KCRP.

Linda Simpson

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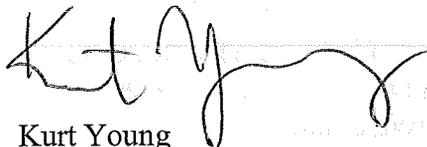
- Mr. Stephens stated in his response that the KCRP conducted “an extensive review” of the party organizations financial records, including committee bank statements, invoices, and receipts, and based on those findings, the KCRP filed a number of amended C-4 reports with the PDC. He stated that the KCRP’s review revealed that during the period of January 1 through July 13, 2015, the KCRP incorrectly reported several expenditures that had been made to Mr. Tibbs.
- Mr. Stephens stated that “a clerical error” had been made when KCRP committee expenditures were initially entered into the Online Reporting of Campaign Activities (ORCA), the PDC electronic filing software developed for disclosing contribution and expenditure information system. He stated that “a number of minor expenses that were related to Mr. Tibbs’ authorized travel expenses were misreported as being paid directly to Mr. Tibbs instead of being properly reported to the actual vendor who provided the services.”
- The KCRP filed a number of amended C-4 reports to properly reflect the actual vendors that were paid by the KCRP. Mr. Tibbs was still listed as being reimbursed by the KCRP for expenses on a number of C-4 reports.

Staff’s review of your complaint found that the KCRP made monthly reimbursements for out-of-pocket expenditures to a number of committee officials, including to Mr. Tibbs during his tenure as Chairman of the party. While a number of the reimbursements that were initially disclosed as having been made to Mr. Tibbs, were subsequently changed to list the original vendor on amended C-4 reports, no evidence was found that any of those expenditures were not for official KCRP authorized activities.

For these reasons, the PDC will not be conducting a more formal investigation into your complaint against the Kitsap County Republican Party or pursuing enforcement action in this case. Thank you for bringing this matter to our attention.

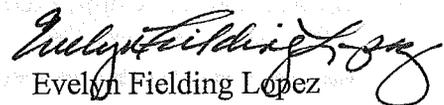
If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,



Kurt Young  
PDC Compliance Officer

Endorsed by:



Evelyn Fielding Lopez  
Executive Director

cc: Tony Stephens, Chair Kitsap County Republican Party



**Public Disclosure Commission**  
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