



June 3, 2016

Jacob Berkey, Compliance Officer
Washington State Public Disclosure Commission
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E-mail: pdcc@pdcc.wa.gov

Subject: Bill McCallum Complaint, received May 31, 2016, Alleged violations of RCW 4217A.235 and .240 for late reporting of campaign contributions and expenditures.

Dear Mr. Berkey,

We are in receipt of your inquiry. In an abundance of caution, please direct future email communications regarding Sheriff Elfo's campaign to his personal email address: sheriffelfo@comcast.net or to me at the Re-Elect Bill Elfo Sheriff campaign at bruce@bruceayers.com. The email address "belfo@co.whatcom.wa.us" is a county government email address.

Upon receipt of the complaint on May 31, 2016 Sheriff Elfo began an immediate investigation into the matter. He contacted his campaign Treasurer for re-election, whom he entrusted full responsibility for timely disclosing of all transaction to the PDC. This is the third campaign that Mr. Decima, Treasurer, has served in this position over the past 12 years.

This letter constitutes the official response on behalf of Re-elect Sheriff Elfo's campaign to the subject Bill McCallum Complaint.

Facts and Circumstances Surrounding subject Bill McCallum Complaint

It is our understanding that because Sherriff Elfo was running un-opposed for re-election and he only appeared on the General Election ballot, that from January to the end of August 2015 his re-election campaign was required to file C-4 reports by the 10th of each month only if there was more than \$200.00 of campaign activity. Once the cumulative activity for the re-election campaign exceeded \$200.00 all monthly reports were then to be submitted.

Sherriff Elfo and his Treasurer recognize that from September to the end of November timely reports are required to be submitted, even if, there is no campaign activity during that time. (RCW 4217A.235 and .240)

The receipts and expenditures for all C4 reporting periods from 6/1 – 12/31/2015 are as follows:

<u>Reporting Period</u>	<u>Due Date</u>	<u>Filing Date</u>	<u>Receipts</u>	<u>Expenditures</u>
6/1 – 7/13/2015	7/15/2015	9/9/2015 (timely)	-0-	-0-
7/14 – 7/27/2015	7/28/2015	9/9/2015 (timely)	-0-	-0-
7/28 – 8/31/2015	9/10/2015	9/9/2015 (timely)	\$268.57	\$824.66
9/1 – 10/12/2015	10/13/2015	2/22/2015 (late)	\$68.75	-0-
10/13 – 10/26/2015	10/27/2015	2/22/2015 (late)	-0-	-0-
10/27 – 11/30/2015	12/10/2015	2/22/2015 (late)	-0-	-0-
12/1 - 12/31/2015	1/11/2016	2/22/2016 (late)	\$17.01	-0-

There were no re-elect campaign expenditures from September to December 2015. There were two receipts for \$68.75 and \$17.01 (bank interest) totaling \$85.76 during the same time period.

Additional Information

Treasurer Decima stated, "I'm sorry that the filings were late but there were extenuating personal circumstances. My wife has Stage IV cancer. Last year, on August 5, 2015, she had a 6 ½ hour surgery in Spokane to remove the cancer. She was in the hospital for fifteen days and endured a three month convalescence period. Needless to say, my priorities quite properly were in regard to her well-being."

In addition he explained that, "During those trying days I made two informal telephone calls to the Public Disclosure Commission and was given to understand that late filings by me would not be a major problem considering the relatively insignificant amount of receipts and expenditures."

Resolution

Sheriff Elfo and Treasurer Decima are ready for any further mitigation required, including, if directed, filing and/or amending any reports as needed.

Sincerely,



Bruce Ayers

Chair Re-elect Sheriff Elfo

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