STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION
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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH RCW 42.17 and RCW 42.17A Ann Rivers Respondent.	PDC Case 15-94 (Ticket 2495) Report of Investigation

I. Background and Allegations

1.1 On May 25, 2012, Ann Rivers filed a Candidate Registration (C-1 report) declaring her candidacy for State Senator in the 18th Legislative District, selecting the Full Reporting option, and listing Fred Rivers, her spouse, as Treasurer.

1.2 Senator Rivers was elected State Representative, Position No. 1 in the 18th Legislative District in 2010, and served one-term in the House before being elected to the Senate in 2012.

1.3 On September 12, 2013, Ann Rivers filed a C-1 report declaring her candidacy for re-election to the office of State Senator in 2016 for the 18th Legislative District, selecting the Full Reporting option, listing Fred Rivers as Treasurer and CAM Consulting as PDC Compliance. **Exhibit #1.**

1.4 On January 8, 2015, Ann Rivers filed an amended C-1 report which still listed Fred Rivers as Treasurer, but included Liz Coleman as a "Ministerial Employee." **Exhibit #2.**

1.5 On October 5, 2015, Kelly Hinton filed a complaint with the PDC against the 2016 Friends of Ann Rivers Campaign, alleging violations of RCW 42.17A.235 and .240 for: (1) failing to timely file Monetary Contribution reports (C-3 reports) and Campaign Summary Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities undertaken for the 2016 election cycle; and (2) failing to disclose contributions received on C-3 reports, since the C-4 reports listed more than $200,000 in total contributions received, and the C-3 reports filed to date show far less contributions.

1.6 On February 9, 2016, PDC staff notified Senator Rivers that a formal investigation was being opened concerning the allegation that the 2016 Friends of Ann Rivers Campaign (Campaign) failed to timely file C-3 and C-4 reports disclosing contribution and expenditure activities. **Exhibit #3.**

1.7 On May 11, 2016 Kelly Hinton filed an additional complaint with the PDC against Senator Rivers alleging that three expenditures made by the Campaign to Bank of America, had not been properly disclosed on C-4 reports.

II. Detailed Findings

2.1 Candidates seeking election to office in 2016 who selected the Full Reporting option were required to file monthly C-3 and C-4 reports through May 31, 2016, due by the 10th of each month and disclosing contribution and expenditure activities of more than $200 incurred in the previous calendar month, or since the last C-4 report was filed. If less than $200 in contribution or expenditure activities were undertaken by the Campaign, no C-3 or C-4 reports were required to have been filed, although the reporting dates listed in the Online Reporting of Campaign Activity (ORCA) are every month.

2.2 RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.

2.3 Staff reviewed the complaint, and the C-3 and C-4 reports filed by the 2016 Campaign, and conducted queries of the PDC contribution and expenditure databases, and found the following:

September 2013 through January 31, 2014

2.4 The Campaign timely filed nine C-3 reports disclosing $7,050 in monetary contributions that had been received and deposited during the period September 12, 2013 through January 12, 2014.

2.5 The Campaign timely filed C-4 reports covering the periods of September 1, 2013 through February 28, 2014, with the February 2014 C-4 report disclosing that $7,050 in total contributions had been received, $6,548 in total expenditures made, with a cash on hand balance of $501.77. **Exhibit #4.**

Allegation No. 1: Failure to accurately disclose campaign contribution and expenditure totals and activities

March 2014:

2.6 On February 10, 2015, the Campaign filed its next C-4 report, the March 2014 C-4 report. **Exhibit #5.** The initial March 2014 C-4 report filed by the Campaign, incorrectly carried forward $182,221.17 in contributions received on line #1 of the report, disclosed no new contributions had been received or expenditures made, no total expenditures made on line #17, and a cash on hand balance of $182,221.17.

2.7 Based on the February 2014 C-4 report totals, the March 2014 C-4 report should have carried forward $7,050 in total contributions received and $6,548 in total expenditures made. Staff reviewed and reconciled the Campaign filings and discovered that the "Final" 2012 Campaign C-4 report (filed September 12, 2013), disclosed $182,221.17 in total contributions received, and $182,221.17 in total expenditures made for the entire 2012 election cycle. **Exhibit #6.**

2.8 The C-3 and C-4 reports were filed electronically by the Campaign using the ORCA software. Somehow the Campaign carried forward the 2012 "Final" contributions totaling $182,221.17 into the 2016 Campaign contribution totals, but they did not carry forward any of the 2012 expenditures into ORCA.

April 1, 2014 through January 31, 2016

2.9 The Campaign continued to include the Final 2012 contribution totals on the C-4 totals filed for the remainder of 2014, all of calendar year 2015, and into January 2016.

2.10 Whenever the Campaign received new contributions for the 2016 election cycle, they were added on the C-4 reports to the 2012 contribution totals, which significantly over-reported total contributions received. In addition, the C-4 reports filed by the Campaign during this period failed to carry forward any of the 2012 expenditure totals from the prior reporting period, so each C-4 report began with $0 expenditures on line #10.

2.11 The Campaign's failure to carry forward expenditure totals combined with the 2012 "Final" contribution totals being included in the 2016 contributions totals, over-reported the Cash on hand balances on line #18 of the C-4 reports as noted below by more than $182,000.

2.12 On October 28, 2015, PDC staff member's Jennifer Hansen and William Lemp, met with Liz Coleman, Treasurer for Senator Ann Rivers Campaign, concerning the October 5, 2015 complaint filed by Mr. Hinton. PDC staff discussed with Ms. Coleman the C-3 and C-4 reporting discrepancies for the 2016 Campaign as listed in the complaint. During the meeting, Ms. Coleman stated that she discovered what appear to be duplicate reports, but that she will need some additional time to research the deposit dates for the contributions, and the information listed on the C-4 reports. Ms. Coleman stated that once that had been completed, she would sign a letter to the PDC explaining the reason for the late filings.

2.13 On February 12, 2016, the Campaign filed the January 2016 C-4 report which was the last C-4 report that included the 2012 contribution totals. The initial January 2016 C-4 report disclosed that the Campaign raised $255,086 in total contributions, made $0 in expenditures, and had a $255,086 cash on hand balance as of January 31, 2016. **Exhibit #7.**

2.14 Shortly after being contacted by staff, the Campaign filed a number of new or amended C-4 reports to correct the C-4 reporting discrepancies over a three-week period as detailed in section 2.19 of this Report. that included: (1) 18 amended C-4 reports filed on February 17, 2016: (2) Four new C-4 reports filed on February 28, 2016; (3) Six new C-4 reports and five amended C-4 reports filed on March 6, 2016; (4) Six amended C-4 reports filed on March 7, 2016; (5) Three new C-4 reports filed on March 8, 2016; and (6) 17 new C-4 reports filed on March 13, 2016.

2.15 On March 13, 2016, the Campaign re-filed a new January 2016 C-4 report correcting the contributions 2016 totals, and subtracting out the 2012 contribution totals. The C-4 report disclosed the Campaign received $111,465 in contributions (no new contributions were received due to the Legislative Session freeze period), $41,047 in total expenditures made, and $70,418 for a cash on hand balance as of January 31, 2016. **Exhibit #8.**

Allegation No. 2: Failure to timely file C-3 reports disclosing monetary contributions (RCW 42.17A.235 and .240)

2.16 On February 10, 2015, the Campaign filed 12 new C-3 reports, and one amended C-3 report disclosing $21,085 in monetary contributions that had been received dating back to May 8, 2014. **Exhibit #9.**

2.17 The C-3 reports were filed by the Campaign between 63 and 246 days late as detailed in the chart below, and disclosed a number of monetary contributions that had been received from "special interest" organizations prior to the start of 2015 Legislative Session. The C-3 reports were filed by the Campaign more than a month after the Legislative session had convened.

Date Received	Date Deposited	Amount of Contributions	C-3 Report Due	C-3 Report Filed	Days Late
5/8/2014	5/8/2014	$ 900	6/10/2014	2/10/2015	246
6/12/2014	6/12/2014	$ 500	6/16/2014	2/10/2015	240
6/23/2014	6/30/2014	$ 1,000	7/7/2014	2/10/2015	219
7/3/2014	7/3/2014	$ 950	7/7/2014	2/10/2015	219
7/13/2014	7/13/2014	$ 1,900	7/14/2014	2/10/2015	212
8/12/2014	8/12/2014	$ 500	8/18/2014	2/10/2015	177
9/12/2014	9/17/2014	$ 5,100	9/22/2014	2/10/2015	142
9/24/2014	9/24/2014	$ 1,500	9/29/2014	2/10/2015	135
10/1/2014	10/7/2014	$ 2,400	10/13/2014	2/10/2015	121
10/9/2014	10/17/2014	$ 2,335	10/20/2014	2/10/2015	114
10/21/2014	10/21/2014	$ 400	10/27/2014	2/10/2015	107
10/28/2014	10/30/2014	$ 850	11/3/2014	2/10/2015	100
11/9/2014	11/13/2014	$ 2,850 (*)	12/10/2014	2/10/2015	63
Totals		**$ 21,085**			**63-246**

(*) Denotes Amended C-3 report disclosing new contributions only.

2.18 The late filed C-3 reports disclosed the following monetary contributions that had been received by the Campaign during the period May 8 through November 13, 2014, from contributors that employed a lobbyist during the 2015 Legislative session:

- A total of $3,800 from the Bassford family members (Dennis, David, Sara and Robin) owners of Moneytree, that were all received on September 12, 2014.
- $1,900 contribution Washington Medical PAC received on November 13, 2014.
- A $950 contribution from Trans Alta USA, received on November 9, 2014.
- A $950 contribution from Amgen, Inc. received on September 17, 2014.
- A $500 contribution from Pacific International Terminals, LLC received on June 30, 2014.

- A $500 contribution from Vulcan, Inc. received on August 12, 2014.
- A $500 contribution from Allergan USA, Inc. received on October 30, 2014.
- A $400 contribution from Microsoft received on October 21, 2014.

Allegation No. 3: Failure to timely file C-4 reports (RCW 42.17A.235)

2.19 The Campaign timely filed the December 2015 C-4 report on January 10, 2016. In addition, the Campaign filed three C-4 reports late, the April and June 2015 C-4 reports and the January 2016 C-4 report, but those reports disclosed $0 in contributions received and expenditures made, and were not a required filing since they did not exceed the $200 statutory threshold found in RCW 42.17A.235(1)(c).

2.20 The Campaign failed to timely file a number of C-4 reports for calendar years 2014 and 2015. The Campaign also filed numerous amended and new C-4 reports to amend and/or replace the 2014 and 2015 C-4 reports that included the 2012 contribution totals, and some of those reports disclosed contribution or expenditure information that was not included on a prior C-4 report. Those C-4 reports are summarized in the chart and described in detail below.

C-4 report Date Filed	Late filed C-4 reports	New/Amended C-4 Reports filed	Period Covered
2/10/2015	16	11–New; 5 – Amended	March 1, 2014 through January 31, 2015
4/20/2015	2	2 – New	February 1 through March 31, 2015
7/15/2015	2	2 – New	May 1 through June 30, 2015
12/22/2015	2	2 – New	October 1 through November 30, 2015
2/17/2016	18	18 – Amended	January 1 2015 through January 31, 2016
2/28/2016	4	4 – New	March 1 through June 30, 2014
3/6/2016	11	6 – New; 5 – Amended	September 12, 2013 to June 30, 2014
3/7/2016	5	5 – Amended	February 1 to June 30, 2014
3/8/2016	3	3 – Amended	July 1 to September 30, 2014.
3/13/2016	17	17 – New	October 1 to February 29, 2016
5/17/2016	11	1–New; 10 – Amended	January 1 through April 30, 2014; August 1, 2014 through January 31, 2015; and for April of 2016

2.21 Since the total 2012 contribution totals were carried forward into the 2016 Campaign totals, the initial C-4 reports filed by the Campaign for the period March 1, 2014 through January 31, 2016, overstated total contribution by more than $182,000, understated total expenditures by up to $40,000 (+), and overstated the cash on hand balance by more than $182,000.

2.22 As noted in the chart above, during the period February 17 through March 13, 2016, the Campaign filed numerous new and amended C-4 reports. Those reports included three to six new or amended C-4 reports filed for each month, with each filed report frequently disclosing different contribution, expenditure, or outstanding liabilities totals and information on each than what was disclosed on the initial C-4 report, the prior amendment, or the most recent C-4 filing.

2.23 The initial, amended, and new C-4 reports filed by the Campaign that are referenced in the chart above, are summarized in a PDC staff generated Word document as a narrative exhibit. **Exhibit #10.** In addition, the initial, amended, and new C-4 reports filed by the Campaign that are summarized in Exhibit #10, are also listed in a PDC staff generated Word document as a table. **Exhibit #11.** The late filed C-4 information disclosed by the Campaign, included the following:

- March 1, 2014 through January 31, 2015: On February 10, 2015, the Campaign filed 11 new C-4 reports and five amended C-4 reports disclosing $24,085 in monetary contributions received and $12,086 in expenditures made that were disclosed between 31 and 276 days late.

- February 2015: On February 17, 2016, the Campaign filed an amended February 2015 C-4 report disclosing $500 in expenditures made, that was disclosed almost one year late.

- March 2015: On February 17, 2016, the Campaign filed an amended March 2015 C-4 report disclosing $1,360 in expenditures made, that were disclosed 10 months late.

- May 2015: On February 17, 2016, the Campaign filed an amended May 2015 C-4 report disclosing $3,625 in expenditures made, that were disclosed 252 days late.

- August 2015: On February 17, 2016, the Campaign filed an amended August 2015 C-4 report disclosing $6,610 in expenditures made, that were disclosed 160 days late.

- September 2015: On February 17, 2016, the Campaign filed an amended September 2015 C-4 report disclosing $1,6994 in expenditures made, that were disclosed 160 days late. On March 13, 2016, the Campaign filed a new September 2015 C-4 report disclosing $6,300 in previously un-reported monetary contributions received that were disclosed 185 days late.

- October 2015: On December 22, 2015, the Campaign filed its initial October 2015 C-4 report disclosing $38,930 in contributions expenditures made, that were disclosed 42 days late. On February 17, 2016, the Campaign filed an amended October 2015 C-4 report disclosing $1,500 in previously un-reported monetary contributions received that were disclosed 99 days late.

- November 2015: On February 17, 2016, the Campaign filed an amended November 2015 C-4 report disclosing $2,360 in previously un-reported monetary contributions received that were disclosed 69 days late. On March 13, 2016, the Campaign filed a new November 2015 C-4 report disclosing $4,050 in previously un-reported monetary contributions received that were disclosed 94 days late.

Responses received from Senator Rivers

2.24 On February 24, 2016, Senator Rivers sent an email to PDC staff providing an initial response to the complaint and staff's initial questions. **Exhibit #12.** On March 15, 2016, Senator Rivers sent an email to PDC staff providing a supplemental response staff questions. **Exhibit #13.** On April 1, 2016, Senator Rivers sent an email to PDC staff providing a response to staff's follow-up questions concerning several expenditures made by the 2016 Campaign. **Exhibit #14.** The three responses from Senator Rivers have been combined into one response as detailed below.

2.25 Senator Rivers stated that she did not receive notification of the Kelly Hinton complaint from the PDC prior to the February 10, 2016 letter from PDC staff formally logging in the complaint. She stated that in early 2014 her Campaign's "compliance professional" who filed the PDC reports retired, and she discovered late in calendar year 2014 that the individual she had hired to replace her *"was not doing the job."* She stated that she thought her replacement "compliance professional" was reconciling the contribution and expenditure information with the campaign bank statements, but now she is not so sure,

2.26 Senator Rivers stated that her new "compliance professional" took over mid 2016 campaign, which was *"...further complicated when the previous compliance professional refused to provide their ORCA files and password, which meant recreating the entire campaign from the beginning. This has proven to be a learning experience."* She went on to state the following:

- *"This past fall I proactively reached out to your office as the result of a local "blog" brought to my attention by a constituent. At that time my compliance professional and I attempted to resolve the issue without the benefit of knowing any of the details of the complaint."*

- *"This has been a great lesson in seeing the PDC work as it was intended - a tool for transparency. I sincerely appreciate the local watchdog who brought this to your attention as well as the time and effort the staff at the PDC has spent reviewing this and aiding in the ultimate resolution. There is no benefit for me to have inaccurate reports. I'm truly thankful that our state has a system with such effective checks and balances."*

2.27 Senator Rivers stated that Ms. Coleman did not inform her whenever she filed a C-3 or C-4 report, but she did receive the PDC notifications through ORCA.

2.28 Senator Rivers stated the process for the Campaign was to submit the contribution, deposit and expenditure information to her "compliance professionals" (CAM Consulting and Ms. Coleman) so they could file the PDC reports.

2.29 Senator Rivers stated that she did not review the C-3 and C-4 filings submitted by her treasurer, either prior to being transmitted electronically or after being filed, because of the electronic nature of C-3 and C-4 reports, she didn't think that was possible. She stated that the Campaign has implemented new processes concerning the handling and reporting of campaign contributions and expenditures.

2.30 Senator Rivers stated the Campaign is confident that *"...this issue has been resolved and will not recur.* In addition, Ms. Coleman is currently reconciling the contribution and expenditure information on monthly basis. As part of this investigation, PDC staff asked Senator Rivers several follow-up questions concerning some of the expenditures made by the Campaign, as detailed below.

$6,610 expenditure to CCJLA on August 15, 2015 for FFA/4-H:

Senator Rivers stated the 18th legislative district is a very rural district and is engaged with the Future Farmers of America (FFA) and the 4H. Every year the Clark County Junior Livestock Association (JLA) holds an auction at the Clark County Fairgrounds, and she spends the entire day sitting in the fairground stands. While sitting in the stands, she gets to meet and talk to hundreds of people about herself and her Campaign. After the animals have been shown and judged at the fair, the animals are then auctioned off, and she bids on many of the animals, and each time she makes a bid, the auctioneer calls out "ANN RIVERS!!"

Senator Rivers stated by the end of the day, thousands of people will have heard her name at the fairgrounds, and that because of her involvement she stated her campaign has received contributions from individuals and business leaders who attend the event. When she wins the auctioned animal, she makes a campaign expenditure to the JLA, FFA or 4H, and then she donates the animal to YEAH. She stated YEAH "...collects the meat after processing it and delivers it to the Clark County Food Bank..." The food bank has a media event where they announce the amount of meat donated to YEAH, and that her Campaign has received a lot of attention from that event over the years.

Two expenditures to CCSC totaling $4,325 for: (1) A May 16, 2015, event sponsorship ($3,525); and (2) A December 12, 2014 marketing/event sponsorships ($1,100):

Senator Rivers stated that state funding has not kept pace with the current costs and other educational demands, so the Clark County Skills Center (CCSC) Foundation needed to raise funds to help it complete its educational mission. She stated at the fundraisers, the food is prepared by CCSC culinary students and then served to attendees by CCSC students in the hospitality program.

Senator Rivers stated that her Campaign's sponsorships of the events, allows the Campaign logo to be included in marketing materials that are distributed both prior to and at the event. She stated that at the fundraising event, she speaks to attendees on an individual basis and that some of the people she has met over the years have hosted fundraisers for her Campaign or made contributions to her campaign's.

Two expenditures to the Salvation Army totaling $3,000: (1) A December 12, 2014 marketing and event sponsorships ($2,000); and (2) A November 9, 2013 marketing/event donation ($1,000).

Senator Rivers stated she/her Campaign became a primary sponsor for the Salvation Army, Washougal Chapter's fall fundraiser several years ago, and that her Campaign paid for the 2014 and 2015 fundraising events.

Senator Rivers stated that this event is held in a very rural part of her legislative district, and she wouldn't normally be in contact with about 200 people who are active in that part of the community. She stated that her sponsorship of the event includes having her Campaign logo on marketing materials, and provides her with "stage time" to address the attendees. She noted that her numbers in the rural Washougal area "have improved noticeably" since she began doing this event.

Three expenditures to Bank of America, two in 2014 and one in 2015, totaling $9,905.

Senator Rivers stated that her Campaign made the three expenditures to Bank of America (BOA) to repay her for campaign expenditures that she had made using her personal credit card. She stated that the Campaign has now *"...obtained a debit card on the campaign account that will be used in cases where the credit card would formerly have been used for campaign expenses...."*

Senator Rivers stated that the Campaign has filed amended C-4 reports disclosing the original vendors for each expenditure she made using the BOA credit card. She stated that the Campaign had previously disclosed the vendor name and the amount of the charge for the services provided to the campaign on the Schedule B to C-4 report as orders-placed, debts and obligations. She stated that all Campaign expenditures, amounts and descriptions of services have been disclosed in the PDC reports and have been filed in accordance and with the direction of PDC staff.

Two expenditures to BGSD totaling $2,188 for: (1) A $1,314 expenditure made on August 28, 2014 to sponsor a field trip; and (2) A $874 expenditure made on September 4, 2015 for student transportation/ marketing.

Senator Rivers stated that both of the Campaign expenditures to the Battle Ground School District were to sponsor a "...5th grade class of Captain Strong Elementary in a trip to Olympia – specifically the cost of the transportation." She stated this was an official school district sponsored activity, so her Campaign logo was not used or included in any of the materials sent home to parents. She stated that her name was included as a sponsor of the trip and that it raised her "name identification" in the district. She added that her Campaign received some media attention from a local newspaper in the form of a story, and that her name was mentioned in the BGSD newsletter.

III. Scope

3.1 PDC staff reviewed the following documents:

- The complaints filed by Kelly Hinton against the Ann Rivers Campaign.
- C-1 reports, C-3 reports, and C-4 reports, including amended reports filed by the Ann Rivers Campaign.
- March 15, 2016, email from Senator Rivers sent to PDC staff.
- April 1, 2016, email from Senator Rivers sent to PDC staff.

- Telephone and email exchanges between Liz Coleman and PDC staff.

IV.
Laws

4.1 **RCW 42.17A.235** and **240** require candidates to timely file accurate and complete reports of contribution and expenditure activities undertaken by the campaign. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed $200 since the last report.

Respectfully submitted this 12th day of October, 2016.

Kurt Young
Compliance Officer

List of Exhibits

Exhibit #1 September 12, 2013, Candidate Registration (C-1 report) filed by Ann Rivers declaring her candidacy for re-election to the office of State Senator in 2016, and listing Fred Rivers as Treasurer.

Exhibit #2 January 8, 2015, Ann Rivers filed an amended C-1 report still listing Fred Rivers as Treasurer, but included Liz Coleman as a "Ministerial Employee

Exhibit #3 October 5, 2015, Kelly Hinton filed a complaint with the PDC against the 2016 Ann Rivers Campaign, alleging violations of RCW 42.17A.235 and .240. On February 9, 2016, PDC staff notified Senator Rivers that staff was opening a formal investigation concerning the allegation that the 2016 Ann Rivers Campaign (Campaign) failed to timely file C-3 and C-4 reports disclosing contribution and expenditure activities.

Exhibit #4 February 2014 C-4 report filed by the Campaign on March 8, 2014.

Exhibit #5 March 2014 C-4 report filed by the Campaign on February 10, 2015.

Exhibit #6 "Final" 2012 C-4 report filed by the Campaign on September 12, 2013.

Exhibit #7 January 2016 C-4 report filed by the Campaign on February 12, 2016.

Exhibit #8 New January 2016 C-4 report filed by the Campaign on March 13, 2016.

Exhibit #9 February 10, 2015, the Ann Rivers Campaign files 12 new Monetary Contributions reports (C-3 reports), and one amended C-3 report.

Exhibit #10 Staff generated Word document providing a narrative for the contribution, expenditure and outstanding liabilities disclosed on the new and amended C-4 reports filed by the Campaign.

Exhibit #11 Staff generated Word document table providing a listing of the Campaign contributions, expenditures and outstanding liabilities disclosed on the new and amended C-4 reports.

Exhibit #12 February 24, 2016, Senator Rivers sent an email to PDC staff providing a response to the complaint and staff's initial questions.

Exhibit #13 March 15, 2016, Senator Rivers sent an email to PDC staff providing a supplemental response to staff's questions.

Exhibit #14 April 1, 2016, Senator Rivers sent an email to PDC staff providing a response to staff's follow-up questions concerning several expenditures made by the Campaign.