



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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January 11, 2019

Sent electronically to Holly Jepson and James Mundy Jr.

Subject: Glenn Blakeslee Complaint Return Letter, PDC Cases 41960, 42389, 42392 and 42717

Dear Ms. Jepson and Mr. Mundy:

The Public Disclosure Commission (PDC) has completed its review of the three complaints filed by Ms. Jepson (PDC Cases 41960, 42389, and 42392), and the complaint filed by Mr. Mundy (PDC Case 42717), against Glenn Blakeslee, a first-time candidate in 2018 seeking the office of Pend Oreille County Sheriff. The complaint alleged that Mr. Blakeslee, a Pend Oreille County Deputy Sheriff in 2018 may have violated RCW 42.17A.555 by using Pend Oreille County Sheriff resources to support your candidacy in 2018; and RCW 42.17A.235 and .240 by failing to disclose expenditures for political advertising in the form of newspaper and billboards on Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

For your information, in order to more efficiently use PDC resources, the four complaints filed against Glenn Blakeslee have been combined into one letter. PDC staff reviewed the allegation listed in the four complaints and attached exhibits, the statutes, rules and PDC Interpretation #04-02 Guidelines for Local Agencies in Election Campaigns, and the Monetary Contributions reports (C-3 reports) and C-4 reports filed by Glenn Blakeslee for Sheriff (Campaign), and the responses from Mr. Blakeslee. Based on staff's review, we found the following:

- On January 25, 2018, Glenn Blakeslee filed a Candidate Registration (C-1 report) declaring his candidacy for County Sheriff in Pend Oreille County, selecting the Full Reporting Option and listing Brandy Warren as the Campaign Treasurer. Mr. Blakeslee was a Deputy Sheriff in Pend Oreille County at the time he declared his candidacy.
- Staff's review found the Campaign timely filed the monthly C-4 reports for January through May 31, 2018, and the 21-Day and 7-Day Pre-Primary C-4 reports. On September 27, 2018, the Campaign filed the 2018 Post-Primary Election C-4 report 17 days late, but the report disclosed no contribution or expenditure activities.

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- On October 22, 2018, the Campaign filed the 21-day Pre-General Election C-4 report disclosing \$1,399 in contributions received, and \$2,374 in expenditures made that included a \$950 expenditure made to Lamar Advertising for billboard advertising, and three expenditures totaling \$1,218 made to *The Newport Minor* for newspaper advertising.
- The 21-day Pre-General Election C-4 report was required to be filed on October 16, 2018 and was filed six days late by the Campaign, and 14 days prior to the November 6, 2018 general election. On October 30, 2018, the Campaign timely filed the day 7-Day Pre-General Election C-4 report disclosing \$739 in contributions received and no expenditure activities.
- In his response, Glenn Blakeslee stated his campaign encountered problems filing the C-4 reports electronically using the Online Reporting of Campaign Activities (ORCA) campaign finance filing software shortly after the August 7, 2018 primary election. He stated that his Campaign team forgot to update the settings in ORCA to indicate his name would be appearing on the 2018 general election ballot, for the general election filing requirements.
- Between July 27 through 29, 2018, the Town of Ione in Pend Oreille County celebrated Down Rivers Days, that included a parade held on July 28, 2018, with arts, crafts, foods and beverage, and other vendors including candidates setting up booths each day in the Ione City Park each day.
- Concerning the alleged use of Pend Oreille County Sheriff's Office facilities to support his candidacy, Mr. Blakeslee stated that he participated in the parade as a candidate on July 28, 2018. He stated that he was off duty that day and was not wearing his Deputy Sheriff's uniform when he participated in the parade as a candidate driving his personal vehicle. He stated that he rented a booth in the park for July 28-29, 2018, to campaign as a candidate for Sheriff in the parade, and that he "actively campaigned all day, and into the evening" on July 28, 2018.
- Mr. Blakeslee stated that he was on duty in uniform as a Deputy Sheriff on July 29, 2018, which was a Sunday and his shift involved working in the Town of Ione for Down River Days, which had activities scheduled in town and in the park that day. As noted above, Mr. Blakeslee had rented a booth in the park for Down River Days for both days to support his candidacy, but since he was on duty on July 29th he did not appear in the booth or actively campaign on Sunday.
- Mr. Blakeslee stated that he parked his patrol vehicle in the city park where it was in full view of hundreds of people, but he did not speak or meet with anyone near his patrol car about this candidacy. He added that he spent the majority of his shift "walking around in full view of hundreds of citizens" and stated "I have never had campaign materials in or on my patrol vehicle. On this date all of my campaign supplies were at my residence – 50 miles away."

PDC staff's review found no evidence that Glenn Blakeslee used the facilities of the Pend Oreille Sheriff's Office to support his candidacy for County Sheriff in 2018, that would require conducting a more formal investigation into your complaint or pursuing enforcement action in this instance.

While the Campaign failed to timely disclose campaign expenditure for a billboard and newspaper advertisements, Mr. Blakeslee was a first-time candidate, and the late filed expenditures were disclosed 14 days prior to the November 6, 2018 general election being held. However, as part of staff's review and the Campaign contacting PDC Filer Assistance, there were several C-3 reports filed that included \$0 contributions that needed to be amended.

In addition, and an issue in disclosing monetary contributions received from couples into the Online Reporting of Campaign Activities (ORCA) campaign finance reporting software that resulted in \$3,000 (+) in un-reported contributor information, and you failed to file a missing 2018 Post-General Election C-4 report. The Campaign has filed the missing Post-General Election C-4 report and filed two amended C-3 reports totaling \$1,739 and are working on filing additional amended C-3 reports to be in full compliance.

Pursuant to WAC 390-37-060(1)(b), and with the understanding that the Blakeslee Campaign will file the necessary amended C-3 reports as soon as possible, Mr. Blakeslee is hereby formally warned concerning the failure to timely and accurately file campaign finance reports disclosing contribution and expenditure activities undertaken by his 2018 Campaign, including C-3 and C-4 reports in future years in accordance with PDC laws and rules. The formal written warning will include staff's expectation that Mr. Blakeslee will timely file C-3 and C-4 reports, accurately disclosing his contribution and expenditure activities undertaken as a candidate in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed the four complaints in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at erick.agina@pdc.wa.gov.

Sincerely,

Endorsed by:

s/_____

s/_____

Erick Agina, Compliance Officer

Peter Lavalley, Executive Director

cc: Glenn Blakeslee

