



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

February 14, 2019

Delivered electronically to "mikeforwhatcomcounty@gmail.com"

Subject: PDC Case 43572

Dear Michael Peetoom:

Below is a copy of an electronic letter sent to Brian Estes concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Brian Estes, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

PDC staff are reminding you about the importance of timely and accurately disclosing all contribution and expenditure activities, including the accurate filing of expense descriptions for all future PDC reports, including the C-1 and F-1 reports.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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February 14, 2019

Delivered electronically to “whatcom52@gmail.com”

Subject: Complaint regarding Michael Peetoom, PDC Case 43572

Dear Brian Estes:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 18, 2018. Your complaint alleged that Michael Peetoom, a first-time candidate seeking the office of Council Member in Whatcom County, may have violated RCW 42.17A.235 for failure to timely or accurately file Monetary Contribution reports (C-3 reports) or Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed your allegations, the applicable statutes, rules, and reporting requirements; the response provided by Michael Peetoom; and the applicable PDC reports filed by the Campaign, to determine whether the record supports a finding of one or more violations.

Based staff’s review, we found the following:

- On May 30, 2018, Michael Peetoom filed a Candidate Registration (C-1 report), declaring his candidacy for Council Member of Whatcom County, and selecting the Full Reporting option. Mr. Peetoom lost the November 6, 2018 General Election with 40,292 votes (41.1%)
- On October 29, 2018, the Campaign filed an amended Summary Full Campaign Contribution and Expenditure report (C-4 report), disclosing a Parade Entry Fee of \$100.00 for the Birch Bay Chamber of Commerce, covering the period of June 1, 2018 to July 16, 2018.

- On December 18, 2018, Michael Peetoom stated in a response that the C-4 report for July 16, 2018 contained an entry description that was inaccurately listed as Parade Entry Fee. Mr. Peetoom further elaborated that the "Birch Bay Chamber of Commerce did not have a parade fee for the Discover Days parade. Filing dates, expense dates and payee information are accurately represented in the PDC filing."
- The response included an attached copy of the sales receipt from the Birch Bay Chamber of Commerce, which had a description of "signage for 2018 events" regarding the \$100.00 expense.
- On January 23, 2019, the Campaign filed a C-4 report to correct the expense description as instructed by PDC staff. The amended description has been changed to "Stage Promo Signage."

Based on these findings and the following facts, staff has determined that in this instance, the failure to accurately file the contribution and expenditure reports does not amount to a material violation warranting further investigation since: (1) Michael Peetoom was a first-time candidate for public office who lost the General Election in 2018; (2) The Campaign made minor or ministerial errors on required reports, which did not materially impact the public interest; (3) The \$100 expenditure for signage represented less than .7 percent of the \$14,447 in total expenditures made by the Campaign; and (4) Michael Peetoom amended the reports and made the necessary technical corrections.

PDC staff is reminding Michael Peetoom about the importance of timely and accurately disclosing all contribution and expenditure activities, including the accurate filing of expense descriptions for all future PDC reports, including the C-1 and F-1 reports.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case. If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Michael Peetoom