



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

January 30, 2019

Delivered electronically to "[marytb@centurytel.net](mailto:marytb@centurytel.net)"

Subject: PDC Case 43945

Dear Lincoln County Republican Central Committee:

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

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

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to comply with the filing requirements noted in the enclosed letter sent to David Hammond. We expect you to file timely and complete C-3 reports in future years in accordance with PDC laws and rules. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Tabatha Blacksmith  
Compliance Coordinator

Endorsed by,

/s \_\_\_\_\_  
Peter Lavalley  
Executive Director

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January 30, 2019

Delivered electronically to "[davidhbbcc@gmail.com](mailto:davidhbbcc@gmail.com)"

Subject: Complaint regarding Lincoln County Republican Central Committee, PDC Case 43945

Dear David Hammond:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on December 5, 2018. Your complaint alleged that the Lincoln County Republican Central Committee (Committee), a bona fide county political party committee, may have violated RCW 42.17A.220 by failing to timely deposit monetary contributions received into the committee bank account, and RCW 42.17A.235 and .240 by failing to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities undertaken by the Committee in 2016 and 2018.

PDC staff reviewed the allegations listed in your complaint, relevant statutes, rules and reporting requirements, the C-3 and C-4 reports filed by the Committee, and the response from the Committee's Officers. As a result of staff's review, we found the following:

- The Committee filed a total of ten new or amended Committee Registrations (C-1pc reports) between September 30, 2015 through January 7, 2019, selecting the Full Reporting option and listing Carol Paul as Committee Chair and Mary Blechschmidt as Committee Treasurer.
- For calendar year 2016, the Committee received a total of \$7,268 in contributions, which included \$3,603 in funds carried forward from 2015, and made \$2,103 in total expenditures.
- Based on the 2016 contribution and expenditure activities, the Committee would have qualified for the Mini Reporting option.
- For calendar year 2018, the Committee received a total of \$9,015 in contributions, which included \$5,409 in funds carried forward from 2017, and made \$8,268 in total expenditures.
- The Committee timely filed its C-4 reports for all of calendar year 2018, including the 7-Day Pre-Primary C-4 report filed on July 31, 2018 covering the period of July 17 through 30, 2018; the report disclosed \$4,863 in expenditures (58.9 percent of all expenditures), including three \$1,000 contributions to legislative candidates totaling \$3,000 and a \$1,800 contribution to the Washington State Republican Party.
- Based on the deposit dates listed on the C-3 reports and the Schedule A to C-4 reports filed by the Committee, it appears the Committee timely deposited monetary contributions.
- While the Committee timely filed the C-4 reports for calendar years 2016 and 2018, the Committee failed to file any C-3 reports until after your complaint was filed in 2018 as follows:
  1. For 2018, the Committee filed 12 C-3 reports disclosing the receipt of \$3,606 in monetary contributions that included a \$1,000 Miscellaneous receipt from Manweller for State

Representative refunding a contribution, \$390 in small contributions received, a \$256 monetary contribution received from Cathy McMorris-Rogers for Congress Campaign, and numerous contributions from Committee officers, PCOs and members totaling less than \$25 but no more than \$250. The C-3 reports disclosing the Committee's monetary contributions received were filed between 59 to 276 days late.

2. For 2016, the Committee filed 15 C-3 reports disclosing the receipt of \$3,665 in monetary contributions that included a \$1,285 in small contributions received and numerous contributions from Committee officers, PCOs and members totaling less than \$25 but no more than \$200. The C-3 reports disclosing the Committee's monetary contributions received were filed between 828 to 1,008 days late.
- The Committee stated the C-3 reports that were filed late resulted from the Respondent's erroneous belief that data uploaded when the C-4 reports were filed was simultaneously uploaded as a C-3 report including required contributor information; the Committee believed this eliminated the need to separately submit C-3 forms.
  - The Committee quickly took corrective action upon being made aware of the complaint and its missing reports and came into compliance within 24 hours, thereby demonstrating a good-faith effort to comply. Staff determined that the noncompliance was isolated (e.g. limited to only C-3 reports), the good faith omissions were the result of a misunderstanding by the Committee officers, and no large contributions or special interest contributions were received by the Committee. In addition, the Committee has no prior PDC violations.

Based on these findings, staff has determined that, in this instance, the Committee's failure to timely file C-3 reports for calendar years 2016 and 2018 does not warrant further investigation or pursuing further enforcement action in this case.

Pursuant to WAC 390-37-060(1)(b), the Lincoln County Republican Central Committee will receive a formal written warning concerning its failure to timely file C-3 reports for calendar years 2016 and 2018. The formal written warning will include staff's expectation that the Lincoln County Republican Central Committee will timely file C-3 reports in future years in accordance with PDC laws and rules. The Commission may 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 this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Tabatha Blacksmith  
Compliance Coordinator

Endorsed by,  
/s \_\_\_\_\_  
Peter Lavalley  
Executive Director

cc: Lincoln County Republican Central Committee