



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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action  
Against:

Bill Littlejohn

Respondent.

PDC Case No. 14-013

Notice of Administrative Charges

IT IS ALLEGED as follows:

**I. Jurisdiction**

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the Public Disclosure Act; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

**II. Allegations**

2. Staff alleges that Respondent Bill Littlejohn violated provisions of the state campaign finance disclosure laws during 2013, as follows:
  - A. RCW 42.17A.435: By concealing the identity of the true source of \$7,500 in cash contributions he made in the name of seven employees of companies in which he holds an ownership interest to Citizens Against Fire District 2 Levy, a political committee registered in opposition to Proposition 1, a fire district levy lid lift ballot proposition on the November 5, 2013 general election ballot; and
  - B. RCW 42.17A.475: By failing to make seven contributions of more than \$100 each, totaling \$7,500, by a written instrument containing the name of the donor and the name of the payee, to Citizens Against Fire District 2 Levy.

### **III. Background & Facts**

3. Bill Littlejohn has an ownership interest in the following businesses located in the City of Sequim, and in Clallam County: Olympic Ambulance; Sherwood Assisted Living; and Olympic Oxygen. These businesses provide ambulance, EMT, first responder, and related services on the Olympic Peninsula.
4. On September 9, 2013, Citizens Against Fire District 2 Levy (CAFD 2 Levy) registered as a political committee in opposition to Proposition 1, a fire district levy lid lift ballot proposition on the November 5, 2013 general election ballot. The ballot proposition failed. Had it passed, some of Mr. Littlejohn's businesses would have been negatively affected.
5. On September 19 and September 27, 2013, Mr. Littlejohn made seven cash contributions totaling \$7,500 to CAFD 2 Levy in opposition to Proposition 1. He made these contributions using the names of seven of his employees by placing the cash in envelopes and putting the employee's name and contact information on the front of the envelope. He then had his staff contact the committee to let it know that there were contributions to pick up at the business. He did this with the expressed purpose of not establishing a paper trail for the contributions.
6. Mr. Littlejohn sought and received permission from six of the seven employees to make a contribution in their name with his money. The six employees stated that they gave Mr. Littlejohn permission, not realizing that there is a prohibition against making a contribution in name of another person. According to the seventh employee, Mr. Littlejohn did not ask for permission to make a contribution in his name.
7. The contributions were made in cash, and not by a written instrument containing the name of the donor (Bill Littlejohn) and the name of the payee (Citizens Against Fire District 2 Levy).
8. CAFD 2 Levy reported seven contributions from Mr. Littlejohn's employees, on September 19 and September 27, 2013, as follows:
  - 1) Corrine Notar: \$1,250 contribution; Bookkeeper, Olympic Ambulance (September 19, 2013);
  - 2) Linda Mellott: \$1,250 contribution; Accountant, Sherwood Assisted Living (September 19, 2013);

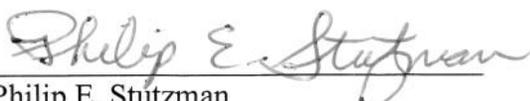
- 3) Frank Beutler: \$1,000 contribution; Service Technician, Olympic Oxygen (September 27, 2013);
  - 4) Gail Reader: \$1,000 contribution; Billing Manager, Olympic Ambulance (September 27, 2013);
  - 5) Todd McClain: \$1,000 contribution; Technician, Olympic Oxygen (September 27, 2013);
  - 6) Rena Keith: \$1,000 contribution; Administrator, Olympic Ambulance (September 27, 2013); and
  - 7) John Schonig: \$1,000 contribution; Fleet Manager, Olympic Ambulance (September 27, 2013).
9. The seven individuals listed above are employees of Mr. Littlejohn, and all confirmed that they did not make a contribution to CAFD 2 Levy with their own funds.
10. Mr. Littlejohn said he made the contributions in this manner because he wanted to keep a low profile during this election. Mr. Littlejohn had experienced a prior adverse reaction when he made contributions to oppose a 2010 ballot proposition in Mason County, a proposition that would have also negatively affected his businesses.

#### **IV. Law and Rules**

**RCW 42.17A.435** states that no contribution shall be made in a fictitious name, by one person through an agent, relative, or other person, or anonymously, in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.

**RCW 42.17A.475** requires certain contributions to be made by written instrument and states: “(1) A person may not make a contribution of more than \*eighty dollars, other than an in-kind contribution, except by a written instrument containing the name of the donor and the name of the payee.” \*By rule, the eight dollar threshold has been increased to one hundred dollars.

Respectfully Submitted this 1<sup>st</sup> day of July, 2014.

  
Philip E. Stutzman  
Director of Compliance