



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

July 24, 2018

Delivered electronically to “[rgaylord@rockisland.com](mailto:rgaylord@rockisland.com)”

Subject: PDC Case 37271

Dear Randall Gaylord:

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

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

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 [tabatha.blacksmith@pdc.wa.gov](mailto:tabatha.blacksmith@pdc.wa.gov)

Sincerely,

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

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

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July 24, 2018

Delivered electronically to "ed.kilduff@me.com"

Subject: Complaint regarding Randall Gaylord, PDC Case 37271

Dear Edward Christopher Kilduff:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on June 19, 2018. Your complaint alleged that Randall Gaylord may have violated Chapter 42.17A RCW and WAC 390-16-125 by failing to timely and accurately report contributions and expenditures, obtain permission to exceed mini reporting limits, and disclose contributor names.

PDC staff reviewed your allegations, and as a result of staff's initial review, we found the following:

- Respondent filed three late C-4 reports during 2018 but no contributions were received and only \$17.72 was expended during the period covered by the late reports; therefore, the public was not deprived of critical information per WAC 390-37-062
- Respondent indicated that the \$6,500 reported on the C-4 filed May 28, 2018 (and subsequent C-4 reports and amendments) was a transfer of surplus funds. No contributions were received so contributors did not need to be reported & mini-reporting limits were not exceeded during the reporting period.
- Respondent requested permission to change to full reporting option on May 28, 2018 and permission was granted by the PDC on June 6, 2018. The Respondent did not raise or spend more than \$5,000 or receive contributions in excess of \$500 prior to the change to full reporting.

Based on these initial findings, staff has determined that, in this instance, no evidence supports a finding of a material violation warranting further investigation.

The PDC has closed the matter, 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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828, or by e-mail at [tabatha.blacksmith@pdc.wa.gov](mailto:tabatha.blacksmith@pdc.wa.gov)

Sincerely,

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

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Randall Gaylord