

[Larnsha](#) replied (Sat, 31 Mar at 12:58 PM)

to : [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

March 30, 2018

Micaiah Titus Ragins  
Compliance Coordinator  
Public Disclosure Commission  
[pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)  
1.360.753.1111

Re: Response to PDC - Helm, Larry: Alleged Violation of RCW 42.17A.555 for use of public resources to support a political Campaign, PDC Case Number 33014.

Dear Micaiah Titus Ragins,

In response to PDC Case Number 33014 please see the following:

RCW 42.17A.010

Conservation district exception.

Elections of conservation district supervisors held pursuant to chapter 89.08 RCW shall not be considered general or special elections for purposes of the campaign disclosure and personal financial affairs reporting requirements of this chapter. Elected conservation district supervisors are not considered elected officials for purposes of the annual personal financial affairs reporting requirement of this chapter.

[ 2002 c 43 § 4. Formerly RCW 42.17.035.]

Even if the Conservation District Supervisor election are not exempt from PDC jurisdiction, my campaign obtained the subject ballot holders list and emails with a voter approved Public Records Request. (RCW 42.56 et seq. Public Records Act) Our use of the legally obtained ballot holders listed emails pertaining to the 2018 Supervisor elections was well within accepted Conservation District election policy and procedures (WAC 135-110 et seq.). All recipient request, received by my campaign, to be removed from our list was and is being honored.

Emails from the Whatcom Conservation District have the following notice:

“The contents of all e-mail transmissions to and from this office may be considered public and subject to the provisions of the Washington State Public Records Act (RCW 42.56 et seq.)”

Therefore, there is no PDC jurisdiction, no basis for the complaint and/or no alleged violation or actual violation made by myself or my supporters. I look forward to your speedy closure of your investigation and your determination of no violation.

Sincerely

Larry Helm, Candidate  
Whatcom Conservation District  
Board of Supervisors.