

[Jim Lazar](#) replied (Sun, 23 Sep at 9:15 AM)

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I offer the following **new information** for my complaint in PDC Case 40612

1) On September 19, 2018, Mr. Peach filed a series of C3 and C4 reports covering the period from the beginning of his campaign through August 31, 2018.

2) This includes disclosure of expenditures as early as May, 2018, incurred before the primary, but disclosed after that election had passed. This is not a remediable violation, since the correction cannot occur 30 days in advance of the election.

3) In the C4 for the period June 1 through July 16, 2018, late-filed on September 19, 2018, Mr. Peach has identified a payment to Laurel Black Design in the amount of \$500 as simply "campaign costs." This is not adequate disclosure of the purpose for which the costs were incurred per WAC 390-16-037 which provides, in pertinent part:

(3) Describe in detail the goods and/or services to be provided by the recipient of the expenditure...

4) In the C4 for the period June 1 through July 16, 2018, Mr. Peach has identified a payment to Olympic Graphic Arts in the amount of \$325.50 for "rack cards." This is not adequate disclosure of the purpose for which the costs were incurred per WAC 390-16-037 which provides, in pertinent part:

(3) Describe in detail the goods and/or services to be provided by the recipient of the expenditure...

5) In the C4 for the period July 17, 2018 through July 30, 2018, late-filed on September 19, 2018, Mr. Peach has identified a payment to Laurel Black Design in the amount of \$2,688.28 as simply "campaign costs." This is not adequate disclosure of the purpose for which the costs were incurred per WAC 390-16-037 which provides, in pertinent part:

(3) Describe in detail the goods and/or services to be provided by the recipient of the expenditure...

6) Mr. Peach placed campaign ads in the Peninsula Daily News in the editions of July 27-28 and July 29. These should have been reported in the C4 report for the period July 17-July 30 as either "expenditures" if he paid the bill when the ads were placed, or as "commitments" if he did not pay the bill when the ads were placed. This C4 contains no disclosure of these expenditures.

7) In the C4 report for the period July 31 through August 31, late-filed on

September 19, 2018, Mr. Peach again reported payments to Laurel Black Design for "campaign costs" without detail, as in (3) above, and payments to Olympic Graphic Arts for "rack cards" without detail, as in (4) above. This is an additional violation of WAC 390-16-037.

8) In the C4 report for the period July 31 through August 31, late-filed on September 19, 2018, Mr. Peach identified a payment dated August 31, 2018 in the amount of \$738 to Sound Publishing for "political ad." Sound Publishing is the publishing company for the Port Angeles Daily News. If this is the payment for the political ads which appeared in the July 27-28 and July 29, and August 3 publications of this newspaper, they expenditure or commitment was required to be reported at the time the expenditure or commitment was made, in July, not August 31.

9) In the C4 report for the period July 31, 2018 through August 31, 2018, Mr. Peach reports an expenditure of \$756.68 on August 31, 2018 for "Candidate Filing." The filing period for this position was May 14 through May 18, and I assume an inquiry to the Clallam County Auditor will show that this payment was made during the filing window. Mr. Peach is reporting this expenditure more than 4 months after it was made, and shows a payment date that is likely fraudulent.

10) In the C4 report for the period July 31, 2018 through August 31, 2018, Mr. Peach reports an expenditure of \$325.50 to Bill Peach for "rack cards." While reimbursement to the candidate if he paid with his own funds is fine, the failure to disclose the detail required by WAC 390-16-037 is a violation.

The above additional information in this complaint indicate a continuing pattern of failure to file in a timely manner (42.17A.235), failure to file required information (WAC 390-16-037) , and failure to accurately describe the expenditures in the expenditure categories provided in ORCA.

The original complaint in this docket was filed on 9/5/18, and docketed by the PDC on September 14. The candidate was notified of the errors by the PDC no later than September 14. Because these filings came after the original complaint was filed and served by the PDC, I believe that the failure to file accurately constitutes wilful failure to comply, not simply inadvertent errors or unawareness of the filing requirements.