

**Re: PDC - Franklin County Republican Central Committee:
Alleged violations of RCW 42.17A.235 and RCW 42.17A.240 for
failure to accurately and timely report contributions,
expenditures, and debts (Sep 17)**

[Patrick Guettner](#) (Tue, 12 Sep at 4:15 PM) via Email

Dear Mr. Fox Blackhorn,

Thank you for your recent telephone discussion with me concerning the "Citizen's Notice" that has been filed against the FCRCC. You helped clarify some of the allegations of the "Notice".

Over the past few days, our Treasurer, David Milne, our Financial Manager/Advisor Curtis Mohr and I have reviewed our financial transactions and reporting. If indeed the FCRCC has been remiss in meeting the reporting deadlines, it is not because of a sincere effort to properly and timely report all financial transactions. The three of us recently completed an internal peer review of our finances and found nothing amiss except that a second reporting of some transactions in 2017 has gone without action because either (1) we were unaware of this requirement, and/or (2) the filing program does not inform the filer of that requirement. We have hence put into place procedural measures to assure that no such non-compliances occur again.

We offer no excuses, but do offer the following reasons for the alleged non-compliances, plus some suggestions to improve the reporting process:

(1) We are a small, agricultural county with low membership and participation. It is difficult to get someone to be treasurer, and many who volunteer are without financial experience and training.

(2) Our one fundraising event is our annual Lincoln Day Dinner with which we have made \$28,000 in the past three years. Even for us as a small political entity, this Dinner is a major undertaking with the included auctions which are the moneymaking activities. It takes weeks if not months to distribute the items and receive payment. The treasurer and PCOs work hours and hours in completing this task, but in each year for the past 3 years during my tenure as Vice-chairman and now Chairman, a sincere effort has been made to properly and timely report the finances.

(3) Our officers are unpaid volunteers, working diligently and long to comply with all state and local requirements. They receive no training, even by the State Party, and many are computer illiterate which hinders the electronic mode of filing.

(4) The reporting sections of the PDC regulations are not user-friendly and do not easily lend themselves to financial reports by county committees. The requirements are more appropriate for campaigns with trained, professional and experience personnel.

(5) We thought we were doing everything properly because we have never received any notice from the PDC otherwise before this "Notice".

(6) With these things in mind, we would suggest that:

- a. a tickler or notice feature be put into place to avoid tardiness issues.
- b. a training program be put into place for treasurers and financial managers as well as other officers. We understand that such an effort is being planned.
- c. an internal PDC audit system be put into place to assist the political parties in maintaining compliance
- d. a checklist be developed and distributed to all treasurers
- e. the wording and meaning of the current regulations be revisited with a goal of supporting and enhancing compliance with input from the users.

We will be checking with you time to time to assure that we are maintaining compliance in all matters.

Thank you for your consideration and understanding. We seek your help in quickly resolving this "Notice".

Sincerely,

Patrick Guettner
Chairman, Franklin County Republican Central Committee
509-545-8089