



STATE OF WASHINGTON  
**PUBLIC DISCLOSURE COMMISSION**

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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In RE COMPLIANCE WITH  
RCW 42.17A

Bruce Chandler (Bruce Chandler  
2014, 2016 & 2018 Election  
Campaigns & Surplus Funds  
Account)

Respondent.

PDC Case 24627

Report of Investigation

**I. Background**

- 1.1 Bruce Chandler is the incumbent State Representative from the 15<sup>th</sup> Legislative District since being elected to that office in 1998 and has served in the legislature since that time running for winning re-election to office in 2000, 2002, 2004, 2006, 2008, 2010, 2012, 2014, and 2016.
- 1.2 On November 5, 2013, Bruce Chandler filed a C-1 report disclosing his candidacy for re-election in 2014 to the office of State Representative from the 15<sup>th</sup> Legislative District, selecting the Full Reporting option, and listing Abby Sanders as Treasurer.
- 1.3 On June 6, 2016, Bruce Chandler filed a C-1 report disclosing his candidacy for re-election in 2016 to the office of State Representative from the 15<sup>th</sup> Legislative District, selecting the Full Reporting option, and listing himself as Treasurer.
- 1.4 On May 8, 2018, Bruce Chandler filed a Candidate Registration (C-1 report) disclosing his candidacy for re-election in 2018 to the office of State Representative from the 15<sup>th</sup> Legislative District, selecting the Full Reporting option, and listing himself as Treasurer.
- 1.5 As noted above Bruce Chandler listed himself as treasurer for the 2016 and 2018 re-election campaign, and for his Surplus Funds Account.
- 1.6 Bruce Chandler was re-elected as State Representative in the 15<sup>th</sup> Legislative District on the November 4, 2014 general election and re-elected on the November 8, 2016 general election. Bruce Chandler has not previously been the subject of a complaint or enforcement action.

## **II. Allegations in Complaint**

- 2.1 On September 1, 2017, Walter Smith, filed a complaint with the PDC alleging that Bruce Chandler failed to file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditure reports (C-4 reports) for his 2016 re-election, disclosing contribution and expenditure activities, and that he also failed to file C-3 and C-4 for his surplus funds account. **(Exhibit 1 – the complaint was addressed to the Attorney General’s Office (AGO), was copied to the PDC, and later confirmed as also having been filed as a PDC complaint on September 13, 2017)**
- 2.2 On September 1, 2017, Walter Smith also filed a Citizen Action Notice under RCW 42.17A.765(4), providing notice to the AGO, the Yakima County Prosecuting Attorney, and the Thurston County Prosecuting Attorney, that he had reason to believe Bruce Chandler (Re-Bruce Chandler Campaign) 2016 Campaign had violated RCW 42.17A by failing to report contributions and expenditures from 2015-2017.
- 2.3 In the complaint, Mr. Smith stated that Bruce Chandler, his campaign committee, Bruce Chandler Campaign, and Bruce Chandler Campaign – Surplus Funds Account, had failed to file: (1) any C-3 or C-4 reports for the 2016 election cycle, including transfers to his surplus funds account ; (2) the receipt transfers into his surplus funds account and expenditures made from that account; and (3) “an unknown number of legally required reports of contributions and expenditures remain outstanding well after the conclusion of the 2016 general election.”
- 2.4 The complaint included evidence that the 2016 Chandler Campaign made a \$60,000 expenditure of apparent surplus funds to the House Republican Organizational Committee (HROC), as disclosed by HROC on a C-3 reports indicating receipt of the transfer of surplus funds on September 13, 2016.
- 2.5 Following its standard practice, PDC staff did not begin an assessment or investigation because the complaint was filed as a Citizen Action Notice under RCW 42.17A.765 with the Attorney General’s Office (AGO), the Yakima County Prosecuting Attorney, and the Thurston County Prosecuting Attorney. In June of 2018, the AGO notified PDC staff they would not be pursuing the allegations against the Chandler campaign, PDC staff began its assessment of the complaint.

## **III. Findings**

- 3.1 On July 18, 2018, PDC staff informed Bruce Chandler of the changes to RCW 42.17A with the passage of ESHB 2938 and explained the impact of those changes on the PDC enforcement process and specifically the complaint filed by Mr. Smith.
- 3.2 PDC staff reviewed the allegations listed in the complaint filed by Mr. Smith and found that no C-3 or C-4 reports had been filed by the Bruce Chandler Campaign 2016 (2016 Campaign).

- 3.3 Based on that information, PDC staff expended the scope of our review and found that no C-3 or C-4 reports had been filed for the Bruce Chandler Campaign 2018 (2018 Campaign). Staff's review indicated that no C-3 reports had been filed by the Bruce Chandler Campaign 2014 (2014 Campaign) after filing a C-3 report on October 14, 2018 for an October 8, 2014 bank deposit, and no C-4 reports disclosing contribution and expenditure activities after September 30, 2014. In addition, staff's review found that C-3 and C-4 reports had not been filed for the Bruce Chandler Surplus Funds Account since 2013.
- 3.4 On September 5, 2017, PDC staff provided a copy of the complaint to Bruce Chandler (including staff's review of 2014 and 2018 campaign non- filings) and asked that he provide a response to the allegations by September 12, 2017, for posting the response to the enforcement page of the PDC website.
- 3.5 In July 2018, Ivan White, on behalf of the Bruce Chandler Campaign, contacted the PDC's Filer Assistance staff regarding specific filing questions upon the request of Representative Chandler, who was a longtime friend. Mr. White did not follow up again regarding additional filing assistance until September 10, 2018.
- 3.6 On August 13, 2018, PDC staff verbally requested a written response to the complaint and requested verification that Bruce Chandler was receiving communications sent via e-mail. As a result, Bruce Chandler verbally requested a new version of the complaint which was resent, via e-mail, on August 15 requesting a response to the complaint by August 29. In addition, staff requested that the response include a summary of the campaign activity for election years 2016 and 2018, which was provided by Bruce Chandler on September 5.
- 3.7 PDC staff notified Bruce Chandler by email, telephone call or voice message concerning the missing 2016 and 2018 Campaign reports, on August 15, August 24, August 27, August 30 and September 4, 2018, respectively, and requested that the missing reports be submitted immediately. The 2016 Campaign reports were submitted on September 18 and the 2018 Campaign reports were submitted on September 12.
- 3.8 On September 7, 2018, PDC staff issued a Subpoena Duces Tecum (Subpoena) to Bruce Chandler requesting that he produce documents concerning the PDC's investigation of the 2014, 2016 and 2018 Bruce Chandler campaigns for State Representative, for PDC Case 24627.
- 3.9 In response to the Subpoena, on September 17-19, 2018, the Chandler Campaign filed 68 C-3 and C-4 reports (covering the period of 2014 -2018) disclosing previously unreported campaign activity. In addition, Bruce Chandler also filed 79 C-3 and C-4 reports disclosing previously unreported expenditures made from the Bruce Chandler Campaign – Surplus Account, and the transfer of surplus funds into the account.
- 3.10 Bruce Chandler stated he did not have campaign records verifying the date the monetary contributions had been received by his campaigns, and that he had to rely on bank statements and other banking records to reconstruct the C-3 reports.

- 3.11 Ultimately, the Chandler Campaign C-3 reports disclosed contributions that appear to have been received and held for more than five business days prior to having been deposited.
- 3.12 In his response dated September 3, 2018, Bruce Chandler stated that he has been a member of the House since being elected in 1998 and that during his sixteen years of service, he was aided by three different professional accounting associates of Peterson, CPA and Advisors PLLC based in Yakima. (**Exhibit 2**).
- 3.13 Following receipt of the Subpoena, Bruce Chandler stated to PDC staff that he was receiving assistance from Mr. Ivan White, CPA, on a voluntary basis to reconstruct the campaign and surplus funds activity. Mr. White contacted PDC Filer Assistance Specialist Chip Beatty on several occasions during the last two weeks of September 2018, for help in filing the missing information.

#### **Summary of 2014 through 2018 Campaign reports**

- 3.14 Candidates appearing on the 2014, 2016, and 2018 primary and general election ballots who selected the Full Reporting option were required to file weekly C-3 reports every Monday beginning June 1, of those even numbered election years, disclosing contributions that were received and deposited the previous seven days. Candidates that have filed for an election in even numbered years, disclose monetary contributions received during an odd numbered year on a monthly basis, if more than \$200 was received or expended since the last C-4 report was filed.
- 3.15 RCW 42.17A.220 requires candidates to timely deposit monetary contributions received into the campaign bank account or depository within five business days of receipt.
- 3.16 Candidates appearing on the 2014, 2016, and 2018 primary and general election ballots were required to file the following C-4 reports:
- A 21-day and a 7-day Pre-Primary Election C-4 report.
  - A Post-Primary Election C-4 report.
  - A 21-day and 7-day Pre-General Election C-4 report.
  - A Post-General Election C-4 report.

Candidates under the Full Reporting option in 2015 were also required to file monthly C-4 reports by the 10<sup>th</sup> of each month disclosing contribution and expenditure activities incurred in the previous calendar month, and

- 3.17 The following information includes a summary of the campaign activity for election years 2014, 2016 and 2018, and a summary of the activity for the surplus funds account. The chart below details the contributions and expenditures by election.

<b>Election Year</b>	<b>Total Contributions</b>	<b>Total Expenditures</b>	<b>Days Late</b>
2014	\$13,382	\$21,821	1,346-1,436
2016	\$110,940	\$113,306	616-1,135
2018	\$50,850	\$2,122	2-579
<b>Totals</b>	<b>\$175,172</b>	<b>\$137,249</b>	<b>2-1,436</b>

### **Bruce Chandler (Bruce Chandler Campaign) 2014 Campaign C-3 & C-4 Reports**

- 3.18 The 2014 Campaign stopped filing reports of campaign contributions and expenditures after the date of the August 4, 2014 primary election. The last C-4 report was filed by the 2014 Campaign on October 27, 2014, covering the period of September 1 through 30, 2014, disclosing contributions of \$83,336 and expenditures of \$71,624. **(Exhibit 3)**
- 3.19 A review of the C-3 reports filed by the 2014 Campaign during the period July 2014 through October 2014 revealed that five C-3 reports were filed late disclosing the receipt of 27 monetary contributions totaling \$10,007. The C-3 reports disclosed the receipt of monetary contributions dating back to July 10, 2014 and were filed between 1,346 and 1,430 days late. **(Exhibit 4 – staff generated spreadsheet)**
- 3.20 The late reported contributions received by the 2014 Campaign after July 9, 2014, were from Corporations, Lobbyist Employers and political committees for special interest groups, local businesses and individuals. The monetary contributions were not timely deposited by the 2014 Campaign within five business days of having been received. In addition, the 2014 Campaign failed to maintain campaign records to verify which additional C-3 reports were required to have been filed, and how late those C-3 reports would have been filed.
- 3.21 A review of C-4 reports filed by the 2014 Campaign during the period September 2014-December 2014 disclosed that four C-4 reports were filed totaling \$13,382 in monetary contributions received and \$21,821 in expenditures made. The four C-4 reports were filed between 1,346 to 1,436 days late. **(Exhibit 5 – staff generated spreadsheet)**
- 3.22 The four late-filed C-4 reports disclosed 2014 Campaign expenditures that included a \$7,000 transfer of 2014 surplus funds to the Bruce Chandler Surplus Funds Account, two expenditures totaling \$11,675 for consulting services and web management services provided to the Campaign by New Media Northwest. The remaining late-filed expenditures included a \$3,000 expenditure to ROC Foundation for voter analysis, a \$100 parade entrance fee, bank service fees and small or un-itemized expenses less than \$50.

### **Bruce Chandler (Bruce Chandler Campaign) 2016 Campaign C-3 & C-4 Reports**

- 3.23 A review of the C-3 reports filed by the 2016 Campaign during the period July 2015-November 2016 revealed that 12 reports were filed by the 2016 Campaign disclosing the receipt of 181 monetary contributions totaling \$110,940. The C-3 reports disclosed the receipt of monetary contributions dating back to July 28, 2015 and were filed between 645 and 1,042 days late. **(Exhibit 6 – staff generated spreadsheet)**
- 3.24 Nearly all of the contributions received by the 2016 Campaign were from Corporations, Lobbyist Employers and political committees for special interest groups, local businesses and individuals. The monetary contributions were not timely deposited by the 2016 Campaign within five business days of having been received. In addition, the 2016 Campaign failed to maintain campaign records to verify which additional C-3 reports were required to have been filed, and how late those C-3 reports would have been filed.
- 3.25 A review of C-4 reports filed by the 2016 Campaign during the period January 2015-December 2016, disclosed that 24 C-4 reports were filed totaling \$110,940 in monetary contributions received and \$113,306 in expenditures made. The 24 C-4 reports were filed between 616 to 1,135 days late, and six of the C-4 reports were statutorily required, the 21 and 7 day- Pre-Primary and Pre-General Election C-4 report and the Post-Primary and General Election C-4 reports. **(Exhibit 7 – staff generated spreadsheet)**
- 3.26 Five of the late-filed C-4 reports disclosed \$95,000 in 2016 Campaign primary and general election surplus funds that were transferred to the Bruce Chandler Surplus Funds Account, and included: (1) A \$60,000 transfer made on August 24, 2016, which was referenced in the complaint as having been received by HROC in September of 2016; (2) A \$16,000 transfer made on November 21, 2016; and (3) A \$15,000 transfer made on December 16, 2016.
- 3.27 The remaining 2016 Campaign late-filed expenses included \$17,756 for consulting and web management services to New Media Northwest, \$455 for the candidate filing fee, bank service fees and small or un-itemized expenses less than \$50.

### **Bruce Chandler (Bruce Chandler Campaign) 2018 Campaign C-3 & C-4 Reports**

- 3.28 A review of the C-3 reports filed by the 2018 Campaign during the period August 2017-August 2018 revealed that three C-3 reports were filed by the 2018 Campaign disclosing the receipt of 76 monetary contributions totaling \$50,850. The C-3 reports disclosed the receipt of monetary contributions dating back to August 31, 2017 and were filed between 30 and 245 days late. **(Exhibit 8 – staff generated spreadsheet)**
- 3.29 Nearly all of the contributions received by the 2018 Campaign were from Corporations, Lobbyist Employers and political committees for special interest groups, local businesses and individuals.

- 3.30 The monetary contributions were not timely deposited by the 2018 Campaign within five business days of having been received. In addition, the 2018 Campaign failed to maintain campaign records to verify which additional C-3 reports were required to have been filed, and how late those C-3 reports would have been filed.
- 3.31 A review of C-4 reports filed by the 2018 Campaign during the period January 2017-August 31, 2018, disclosed that 20 C-4 reports were filed totaling \$50,850 in monetary contributions received and \$2,122 in expenditures made. The 20 C-4 reports were filed between 2 to 579 days late, and three of the 20 late-filed C-4 reports were required 21 and 7-Day Pre-Primary C-4 reports, and the 2018 Post-Primary C-4 report. **(Exhibit 9 – staff generated spreadsheet)**
- 3.32 The four late-filed C-4 reports disclosed 2018 Campaign expenditures that included \$1,076 for candidate travel and accommodation costs (Portland Marriot and Fairfield Inn), \$478 for the candidates filing fee, and a bank service fee for a returned check.

#### **Bruce Chandler (Bruce Chandler Campaign – Surplus Account) C-3 & C-4 Reports**

- 3.33 Candidates and elected officials that have established a surplus funds account are required to file C-4 reports in accordance with WAC 390-16-236, once the account has been registered with the PDC. Surplus funds account C-4 reports are required to be filed monthly if more than \$200 was received or expended since the last C-4 report was filed. C-3 reports are only required to be filed by the official disclosing the transfers of surplus funds from the current campaign account into the surplus funds account.
- 3.34 On November 2, 2000, Bruce Chandler filed a C-1 report establishing the Bruce Chandler Surplus Funds Account, selecting the Full Reporting option, and listing himself as Treasurer. A review of the C-3 reports filed by the Bruce Chandler Surplus Funds Account during the period November 1, 2013 through August 31, 2018 revealed that 11 C-3 reports were filed disclosing ten deposits for transfers of 2014 and 2016 campaign surplus funds totaling \$187,520. The C-3 reports disclosed transfers dating back to December of 2014 and were filed between 17 and 1,752 days late. **(Exhibit 10 – staff generated spreadsheet)**
- 3.35 A review of C-4 reports filed by the Bruce Chandler Surplus Funds Account during the period November 1, 2013 through August 31, 2018 disclosed that 58 C-4 reports were filed totaling \$187,520 in deposits and \$127,482 in expenditures made. The 58 C-4 reports were filed between 17 to 1,752 days late by the Bruce Chandler Surplus Funds Account, and 30 of the late-filed C-4 reports were required on a monthly basis, if more than \$200 was received or expended since the last C-4 report was filed. **(Exhibit 11 – staff generated spreadsheet)**
- 3.36 The expenditures disclosed by the Bruce Chandler Surplus Funds Account included four contributions totaling \$105,000 made to the House Republican Organizational Committee (HROC) as follows: (1) a \$60,000 contribution to HROC on September 14, 2016; (2) a \$35,000 contribution to HROC on September 10, 2014; (3) a \$5,000 contribution to HROC on October 5, 2015; and (4) a \$5,000 contribution to HROC

on October 7, 2014. All of the surplus fund contributions were made prior to a general election being held in 2014, 2015, and 2016, and were used to support candidates on the ballot for those years.

- 3.37 The remaining expenditures included travel costs to attend conferences, travel to Olympia and Alaska, more than \$1,300 in contributions to political party organizations, fuel and meal costs, publications, and miscellaneous small expenditures.

#### **IV. Scope**

4.1 PDC staff reviewed the following documents:

1. A complaint filed against Bruce Chandler, (Bruce Chandler Campaign) 2016 Campaign, received from Walter Smith, an attorney with Smith & Dietrich, on September 1, 2017.
2. A response to the complaint submitted by Representative Bruce Chandler on September 3, 2018.
3. C-3 reports of contributions, and C-4 reports of contributions and expenditures, filed by Ivan White on behalf of Bruce Chandler's re-election campaigns for 2014, 2016 and 2018 and Surplus Funds Account.

4.2 PDC staff contacted the Respondent, either by telephone or voice message, and email as follows:

1. On September 5, 2017, PDC staff provided a copy of the complaint to Bruce Chandler.
2. In July 2018, Ivan White, on behalf of the Bruce Chandler Campaign, contacted the PDC's Filer Assistance staff regarding specific filing questions upon the request of Representative Chandler, who was a longtime friend.
3. On August 13, 2018, PDC staff verbally requested a written response to the complaint.
4. PDC staff notified Bruce Chandler concerning the missing 2016 and 2018 Campaign reports, on August 15, August 24, August 27, August 30 and September 4, 2018, respectively, and requested that the missing reports be submitted immediately.
5. On September 7, 2018, PDC staff issued a Subpoena Duces Tecum (Subpoena) to Bruce Chandler requesting that he produce documents concerning the PDC's investigation.

#### **V. Laws and Rules**

**RCW 42.17A.235** and **RCW 42.17A.240** require candidates to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report; on the twenty-first day and the seventh day immediately preceding the date on which the election is held; and on the tenth day of the first month after the election.


In addition, candidates are required to maintain campaign books of accounts and records to verify the information disclosed on the C-3 and C-4 reports.

**RCW 42.17A.220** states that all monetary contributions received by a candidate or political committee shall be deposited by candidates, political committee members, paid staff, or treasurers in a depository in an account established and designated for that purpose. Such deposits shall be made within five business days of receipt of the contribution.

**RCW 42.17A.430** states that surplus funds may be held in a separate account for nonreimbursed public office-related expenses or as otherwise provided in this section including transfer to a political party or caucus political committee, and that any disposition must be reported in accordance with RCW 42.17A.240.

**WAC 390-16-236** requires official to register a surplus funds account with the PDC by filing a C-1 report establishing the account, and to file C-3 and C-4 reports disclosing activities undertaken through the account.

Respectfully submitted this 11<sup>th</sup> day of October, 2018.

  
\_\_\_\_\_  
Jennifer Hansen  
Compliance Officer

#### **List of Exhibits**

- |                  |   |
|------------------|---|
| <b>Exhibit 1</b> | Complaint filed with the PDC by Walter Smith against Bruce Chandler (Bruce Chandler Campaign 2016) and (Bruce Chandler Campaign – Surplus Account), received September 1, 2017. |
| <b>Exhibit 2</b> | Response to complaint, submitted Representative Bruce Chandler, on September 3, 2018.   |
| <b>Exhibit 3</b> | PDF copy of September 2014 C-4 report filed by the 2014 Campaign on October 27, 2014.   |
| <b>Exhibit 4</b> | PDC staff generated spreadsheet detailing the late-filed C-3 reports filed by the 2014 Campaign, covering the period July-October 2014.   |
| <b>Exhibit 5</b> | PDC staff generated spreadsheet detailing the late-filed C-4 reports filed by the 2014 Campaign, covering the period September-December 2014.                                   |
| <b>Exhibit 6</b> | PDC staff generated spreadsheet detailing the late-filed C-3 reports filed by the 2016 Campaign, covering the period July 2015-November 2016.                                   |
| <b>Exhibit 7</b> | PDC staff generated spreadsheet detailing the late-filed C-4 reports filed by the 2016 Campaign, covering the period January 2015-December 2016.                                |

- Exhibit 8** PDC staff generated spreadsheet detailing the late-filed C-3 reports filed by the 2018 Bruce Chandler campaign, covering the period August 2017-August 2018.
- Exhibit 9** PDC staff generated spreadsheet detailing the late-filed C-4 reports filed by the 2018 Campaign, covering the period January 2017-August 2018.
- Exhibit 10** PDC staff generated spreadsheet detailing the late-filed C-3 reports filed by the Bruce Chandler Surplus Funds Account, covering the period November 2013-August 2018.
- Exhibit 11** PDC staff generated spreadsheet detailing the late-filed C-4 reports filed by the Bruce Chandler Surplus Funds Account, covering the period November 2013-August 2018.

Smith & Dietrich  
Law Offices PLLC

September 1, 2017

*Via Electronic Delivery*

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Re: *Citizen Action Notice Against State Representative Bruce Chandler*

Dear Attorney General Ferguson and County Prosecuting Attorneys Tunheim and Brusic,

I write to notify you that there is good reason to believe violations of chapter 42.17A RCW, Washington State's campaign finance law, have been committed by State Representative Bruce Chandler and the Bruce Chandler Campaign, a candidate authorized committee (the "Respondents"), between 2015 and the present. Please note that, as provided by RCW 42.17A.765(4), if you do not initiate an action against the Respondents within the applicable statutory notice periods for this Citizen Action Notice, I intend to satisfy any applicable notice requirements and proceed with an action in the name of the State. This message is being sent to each of you at the e-mail address you have provided to the Washington State Bar Association to ensure you receive notification of these allegations as required by RCW 42.17A.765(4).

This notice details six or more apparent violations of various provisions of Washington's campaign finance law by the Respondents, which took place during their campaign to elect Mr. Chandler to the Washington House of Representatives for the 15<sup>th</sup> Legislative District in 2016. The cumulative lateness for the untimely reporting summarized in this notice would be at least 2,218 days late as of today. The Respondents have apparently violated chapter 42.17A RCW as follows:

**A. Personal use of candidate's authorized committee funds and unauthorized transfer to political committee (2 violations)**

By law, a candidate may not make personal use of funds raised for campaign purposes except under certain narrow circumstances. RCW 42.17A.445. Contributions to political committees are not permitted from authorized committee funds although they may be made using surplus funds. RCW 42.17A.430(8). On September 13, 2016, the House Republican Organizational Committee reported receiving a contribution of \$60,000 from Respondent Bruce Chandler Campaign's surplus funds. However, the Respondent Committee did not report making such a transfer from surplus funds. If the Committee transferred funds directly from its campaign moneys to the HROC, then it would appear

this was a violation of the prohibition on personal use of campaign funds, and an unlawful transfer to another committee.

**B. Failure to report expenditure for surplus funds account (1 violation)**

A candidate may use surplus funds for certain qualifying purposes provided he or she registers and reports the activity as provided by law. RCW 42.17A.430, WAC 390-16-236. On September 13, 2016, the House Republican Organizational Committee reported receiving a contribution of \$60,000 from Respondent Bruce Chandler Campaign's surplus funds. Respondents' PDC filings do not reveal reporting for this surplus funds transfer to date.

If Respondents transferred these surplus funds, they were required to report the account's expenditures on form C-4. Reporting of the form C-4 for the transfer would be due by 10/10/16 (and is 326 days late), but apparently no surplus funds reporting was filed to date.

**C. Failure to timely file and/or amend Public Disclosure Commission form C-3 and C-4 reports ("Summary, Full Report Receipts and Expenditures" and "Cash Receipts Monetary Contributions") (Unknown Number of Violations [at least five])**

The Respondents filed no reporting of their contributions and expenditures for the 2016 election year on forms C-3 and C-4 to date. By law, these regular reports of contributions and expenditures would be due throughout the 2016 election cycle. RCW 42.17A.235, .240. Respondents indicated their election to comply with full reporting in form C-1 filed, and amended, on June 6, 2016. PDC reports 100698949, 100698947. According to the Secretary of State, there are 58,642 registered voters in the 15<sup>th</sup> Legislative District, meaning that full reporting requirements are not waived under RCW 42.17A.135(1) or .200. It appears that an unknown number of legally required reports of contributions and expenditures remain outstanding well after the conclusion of the 2016 general election. At a minimum, the candidate presumably paid a filing fee reportable as an expenditure in May 2016, and owed form C-4 for the May reporting period (due June 6, 2016, and currently 452 days late), as well as the two mandatory pre-primary reports (due July 12 and 26, 2016, and currently 818 days late) and the two mandatory pre-general election reports (due October 18 and November 1, 2016, and currently 622 days late) on form C-4.

I await your position as to whether there is reasonable cause for a civil enforcement action based on these allegations, and whether you will file such an action in the name of the State.

Sincerely,



Walter M. Smith

cc: Linda A. Dalton, Senior Counsel, Attorney General's Office (via e-mail)  
Public Disclosure Commission staff (via e-mail)

Bruce Chandler Campaign  
P.O. Box 1108  
Zillah, WA 98953

RE: Complaint submitted to PDC

Ms. Jennifer Hansen:

I first stood for election the state legislature in the 1998 election. Over the following 16 years I was aided by 3 different professional accountants. Each of them maintained frequent communication with me, and with the PDC staff. They each found a successor before leaving the position. They were all associates of Peterson, CPA and Advisors PLLC in Yakima, WA.

Shortly after the conclusion of the 2014 election the third treasurer, Angela Wentz left Peterson, CPA to take on a new opportunity. She encouraged me to employ her assistant, Abby Sanders, to take on the responsibility of campaign treasurer. I believe Ms. Sanders attended at least two training sessions conducted by the PDC during 2015.

I first became aware that there was a problem was in September, 2016 when I was first contacted by Mr. Stutzman. I attempted to contact Ms. Sanders by telephone, email, text and at the Peterson, CPA office repeatedly for several weeks, but failed to receive a response.

Having failed to locate Ms. Sanders, I have sought the assistance of Ivan White, CPA to help locate records and transfer information to PDC reports and he has graciously accepted.

We are currently searching for relevant information pertaining to both the campaign account and the campaign surplus account to more directly respond to the specific complaints submitted to the PDC.

I do not believe that any inappropriate transfer of funds has been made from the campaign account to the House Republican Campaign account. However, I am reviewing records again to confirm that.

With Mr. White's help we are reconstructing records and I expect to begin providing the reports soon.

I appreciate this opportunity to respond to the complaints and look forward to addressing every concern.

Sincerely,

Bruce Chandler

Information for PDC

9-5-18

Campaign Account

Balance 1/1/17 - \$2,607

Withdrawals - \$312 Fairfield Inn

\$55 Bank service charges

\$767 Conference of State Governments (@Portland)

Total - \$1,134

Deposit 12/06/17 - \$6,450

Ending Balance 2017 - \$7,923

Balance 1/1/18 - \$7,923

Withdrawals - \$478 Filing Fee - WA Secretary of State

\$510 Bank service charges

Total - \$988

Deposit 7/20/18 - \$29,400

7/31/18 Balance - \$36,336

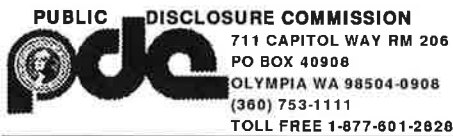
Surplus Account

Balance 8/1/18 - \$28,749

Withdrawals - \$1,000 to Yakima County Republican Party

Deposits - \$35,000 Transfer from Campaign Account

8/31/18 Balance - \$62,749



# SUMMARY, FULL REPORT RECEIPTS AND EXPENDITURES

<b>C4</b> (3/97)	<b>PDC OFFICE USE</b>
	100610319
	10-27--2014

Candidate or Committee Name (Do not abbreviate. Include full name) BRUCE Q CHANDLER (Bruce Chandler Campaign)			
Mailing Address PO BOX 1108		City ZILLAH, WA	
Zip + 4 98953	Office Sought (Candidates) STATE REPRESENTATIVE	Election Date 2014	<b>*For PACs, Parties &amp; Caucus Committees:</b> During this report period, did the committee make an <u>independent expenditure</u> (i.e., an expense not considered a contribution) <u>supporting or opposing a state or local candidate</u> ?
Report Period Covered 09/01/14	To (end of period) 09/30/14	Final Report? Yes No X	

## RECEIPTS

\*See next page      Yes      No

1. Previous total cash and in kind contributions (From line 8, last C-4) (if beginning a new campaign or calendar year, see instruction booklet) .....	\$	79,205.96
2. Cash received (From line 2, Schedule A) .....	\$	4,130.00
3. In kind contributions received (From line 1, Schedule B) .....		0.00
4. Total cash and in kind contributions received this period (Line 2 plus 3) .....		4,130.00
5. Loan principal repayments made (From line 2, Schedule L) .....		0.00
6. Corrections (From line 1 or 3, Schedule C) .....	Show + or (-)	0.00
7. Net adjustments this period (Combine line 5 & 6) .....	Show + or (-)	0.00
8. Total cash and in kind contributions during campaign (Combine lines 1, 4 & 7) .....		83,335.96
9. Total pledge payments due (From line 2, Schedule B) .....	0.00	

## EXPENDITURES

10. Previous total cash and in kind expenditures (From line 17, last C-4) (If beginning a new campaign or calendar year, see instruction booklet) .....		71,623.79
11. Total cash expenditures (From line 4, Schedule A) .....		0.00
12. In kind expenditures (goods & services) (From line 1, Schedule B) .....		0.00
13. Total cash and in kind expenditures made this period (Line 11 plus line 12) .....		0.00
14. Loan principal repayments made (From line 2, Schedule L) .....		0.00
15. Corrections (From line 2 or 3, Schedule C) .....	Show + or (-)	0.00
16. Net adjustments this period (Combine lines 14 & 15) .....	Show + or (-)	0.00
17. Total cash and in kind expenditures during campaign (Combine lines 10, 13 and 16) .....		71,623.79

CANDIDATES ONLY			
	Won	Lost	Unopposed
Primary election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General election	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Treasurer's Daytime Telephone No.: (509) 575-1040			

CASH SUMMARY	
18. Cash on hand (Line 8 minus line 17) .....	11,712.17
[Line 18 should equal your bank account balance(s) plus your petty cash balance.]	
19. Liabilities: (Sum of loans and debts owed) .....	0.00
20. Balance (Surplus or deficit) (Line 18 minus line 19) .....	11,712.17

<b>CERTIFICATION:</b> I certify that the information herein and on accompanying schedules and attachments is true and correct to the best of my knowledge.			
Candidate's Signature BRUCE CHANDLER	Date 10/10/14	Treasurer's Signature ABBY SANDERS	Date

# CASH RECEIPTS AND EXPENDITURE

SCHEDULE  
to C4

**A**  
(11/93)

2

Candidate or Committee Name (Do not abbreviate. Use full name.)

Report Date

BRUCE Q CHANDLER (Bruce Chandler Campaign)

09/01/14

09/30/14

1. CASH RECEIPTS (Contributions) which have been reported on C3. List each deposit made since last C4 report was submitted.

Date of deposit	Amount	Date of deposit	Amount	Date of deposit	Amount	Total deposits
09/24/2014	4,130.00					

2. TOTAL CASH RECEIPTS

Enter also on line 2 of C4 \$ 4,130.00

**CODES FOR CLASSIFYING EXPENDITURES:** If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

- 1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
- 2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
- 3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE  
DEFINITIONS  
ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)  
I - Independent Expenditures  
L - Literature, Brochures, Printing  
B - Broadcast Advertising (Radio, TV)  
N - Newspaper and Periodical Advertising  
O - Other Advertising (yard signs, buttons, etc.)  
V - Voter Signature Gathering

P - Postage, Mailing Permits  
S - Surveys and Polls  
F - Fundraising Event Expenses  
T - Travel, Accommodations, Meals  
M - Management/Consulting Services  
W - Wages, Salaries, Benefits  
G - General Operation and Overhead

## 3. EXPENDITURES

- a) Expenditures of \$50 or less, including those from petty cash, need not be itemized. Add up these expenditures and show the total in the amount column on the first line below..
- b) Itemize each expenditure of more than \$50 by date paid, name and address of vendor, code/description, and amount.
- c) For each payment to a candidate, campaign worker, PR firm, advertising agency or credit card company, attach a list of detailed expenses or copies of receipts/invoices supporting the payment.

Date Paid	Vendor or Recipient (Name and Address)	Code	Purpose of Expense and/or Description	Amount
N/A	Expenses of \$50 or less	N/A	N/A	

4. TOTAL CASH EXPENDITURES

Total from attached pages \$ 0.00

Enter also on line 11 of C4 \$ 0.00

Bruce Chandler (2014 Campaign)

PDC Case 24627

Late C-3 Reports

Report Type	Electronic Filing Receipt Number	Date Contributions Received	Date of Deposit	C-3 Due Date	Date C-3 Filed	Days Late	Amount	No. of Contributors
C-3	100 859 888	10/14/2014	10/14/2014	10/20/2014	9/19/2018	1430	\$23	1
C-3	100 859 889	7/10 - 10/22/14	10/31/2014	11/3/2014	9/19/2018	1416	\$7,700	19
C-3	100 859 890	10/21 - 10/30/14	11/14/2014	12/10/2014	9/19/2018	1379	\$1,600	5
C-3	100 859 892	10/30/2014	11/17/2014	12/10/2014	9/19/2018	1379	\$184	1
C-3	100 859 891	9/29/2014	12/8/2014	1/12/2015	9/19/2018	1346	\$500	1
(5 Reports)						6,950	\$10,007	27
						(1346-1430)		

Bruce Chandler (2014 Campaign)  
PDC Case 24627  
Late C-4 Reports

Report Type	Electronic Filing Receipt Number	From	To	Due Date	Date Filed	Days Late	Receipts	Expenditures
C-4	100 859 883	9/1/2014	10/13/2014	10/14/2014	9/19/2018	1,436	\$3,375	\$10,721
C-4	100 859 884	10/14/2014	10/27/2014	10/28/2014	9/19/2018	1,422	\$23	\$3,000
C-4	100 859 885	10/28/2014	11/30/2014	12/10/2014	9/19/2018	1,379	\$9,484	\$1,100
C-4	100 859 886	12/1/2014	12/31/2014	1/12/2015	9/19/2018	1,346	\$500	\$7,000
						<b>5,583</b>	<b>\$13,382</b>	<b>\$21,821</b>
4 Late C-4 Reports								
5,583 days late (1,346-1,436)								
Receipts on late-reported C-4 reports - \$13,382								
Late Reported Expenditures - \$21,821								

Bruce Chandler (2016 Campaign)

PDC Case 24627

Late C-3 Reports

Report Type	Electronic Filing Receipt Number	Date Contributions Received	Date of Deposit	C-3 Due Date	Date C-3 Filed	Days Late	Amount	No. of Contributors
C-3	100 859 182	7/28 - 9/30/15	10/2/2015	11/10/2015	9/17/2018	1042	\$5,200	6
C-3	100 859 184	9/2 - 11/6/15	12/3/2015	1/11/2016	9/17/2018	980	\$6,050	9
C-3	100 859 185	10/31 - 12/10/15	12/23/2015	1/11/2016	9/17/2018	980	\$6,100	8
C-3	100 859 735	4/18 - 7/11/16	7/22/2016	7/25/2016	9/18/2018	785	\$16,025	31
C-3	100 859 736	5/16 - 7/27/16	7/29/2016	8/1/2016	9/18/2018	778	\$18,950	31
C-3	100 859 737	6/16 - 7/28/16	8/12/2016	8/15/2016	9/18/2018	764	\$12,000	22
C-3	100 859 738	6/28 - 8/3/16	8/18/2016	8/22/2016	9/18/2018	757	\$4,400	6
C-3	100 859 739	6/9 - 7/29/16	8/24/2016	8/29/2016	9/18/2018	750	\$1,050	3
C-3	100 859 740	7/18 - 9/21/16	10/4/2016	10/10/2016	9/18/2018	708	\$12,750	18
C-3	100 859 741	8/7 - 10/26/15	11/16/2015	12/10/2015	9/18/2018	1013	\$11,025	13
C-3	100 859 743	7/7 - 11/7/16	11/25/2016	12/12/2016	9/18/2018	645	\$10,890	20
C-3	100 859 744	9/20 - 10/28/16	11/29/2016	12/12/2016	9/18/2018	645	\$6,500	14
(12 Reports)						9,847	\$110,940	181
						(645-1042)		

Bruce Chandler (2016 Campaign)

PDC Case 24627

Late C-4 Reports

Report Type	Electronic Filing Receipt Number	From	To	Due Date	Date Filed	Days Late	Receipts	Expenditures
C-4	100 859 710	1/1/2015	1/31/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 711	2/1/2015	2/28/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 712	3/1/2015	3/31/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 713	4/1/2015	4/30/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 714	5/1/2015	5/31/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 715	6/1/2015	6/30/2015	8/10/2015	9/18/2018	1,135	\$0	\$0
C-4	100 859 716	7/1/2015	7/31/2015	8/10/2015	9/18/2018	1,135	\$0	\$3,000
C-4	100 859 717	8/1/2015	8/31/2015	11/10/2015	9/18/2018	1,043	\$0	\$0
C-4	100 859 718	9/1/2015	9/30/2015	11/10/2015	9/18/2018	1,043	\$0	\$0
C-4	100 859 719	10/1/2015	10/31/2015	11/10/2015	9/18/2018	1,043	\$5,200	\$0
C-4	100 859 720	11/1/2015	11/30/2015	12/10/2015	9/18/2018	1,013	\$11,025	\$1,094
C-4	100 859 721	12/1/2015	12/31/2015	1/11/2016	9/18/2018	981	\$12,150	\$0
C-4	100 859 722	1/1/2016	1/31/2016	6/10/2016	9/18/2018	830	\$0	\$0
C-4	100 859 723	2/1/2016	2/29/2016	6/10/2016	9/18/2018	830	\$0	\$0
C-4	100 859 724	3/1/2016	3/31/2016	6/10/2016	9/18/2018	830	\$0	\$0
C-4	100 859 725	4/1/2016	4/30/2016	6/10/2016	9/18/2018	830	\$0	\$0
C-4	100 859 726	5/1/2016	5/31/2016	6/10/2016	9/18/2018	830	\$0	\$455
C-4	100 859 727	6/1/2016	7/11/2016	7/12/2016	9/18/2018	798	\$0	\$17,756
C-4	100 859 728	7/12/2016	7/25/2016	7/26/2016	9/18/2018	784	\$16,025	\$0
C-4	100 859 729	7/26/2016	8/31/2016	9/12/2016	9/18/2018	736	\$36,400	\$60,001
C-4	100 859 730	9/1/2016	10/17/2016	10/10/2016	9/18/2018	708	\$12,750	\$0
C-4	100 859 731	10/18/2016	10/31/2016	11/1/2016	9/18/2018	686	\$0	\$0
C-4	100 859 732	11/1/2016	11/30/2016	12/12/2016	9/18/2018	645	\$17,390	\$16,000
C-4	100 859 733	12/1/2016	12/31/2016	1/10/2017	9/18/2018	616	\$0	\$15,000
						<b>22,191</b>	<b>\$110,940</b>	<b>\$113,306</b>
24 Late C-4 Reports								
22,191 days late (616-1,135)								
Receipts on late-reported C-4 reports - \$110,940								
Late Reported Expenditures - \$113,306								

Bruce Chandler (2018 Campaign)  
PDC Case 24627  
Late C-3 Reports

Report Type	Electronic Filing Receipt Number	Date Contributions Received	Date of Deposit	C-3 Due Date	Date C-3 Filed	Days Late	Amount	No. of Contributors
C-3	100 858 706	8/31 - 11/14/17	12/6/2017	1/10/2018	9/12/2018	245	\$6,450	10
C-3	100 858 707	3/18 - 7/2/18	7/20/2018	7/23/2018	9/12/2018	51	\$29,400	46
C-3	100 858 708	4/25 - 8/4/18	8/7/2018	8/13/2018	9/12/2018	30	\$15,000	20
(3 Reports)						326	\$50,850	76
						(30-245)		

Bruce Chandler (2018 Campaign)  
PDC Case 24627  
Late C-4 Reports

Report Type	Electronic Filing Receipt Number	From	To	Due Date	Date Filed	Days Late	Receipts	Expenditures
C-4	100 858 709	1/1/2017	1/31/2017	2/10/2017	9/12/2018	579	\$0	\$315
C-4	100 858 711	2/1/2017	2/28/2017	8/10/2017	9/12/2018	398	\$0	\$5
C-4	100 858 712	3/1/2017	3/31/2017	8/10/2017	9/12/2018	398	\$0	\$5
C-4	100 858 713	4/1/2017	4/30/2017	8/10/2017	9/12/2018	398	\$0	\$5
C-4	100 858 714	5/1/2017	5/31/2017	8/10/2017	9/12/2018	398	\$0	\$7
C-4	100 858 715	6/1/2017	6/30/2017	8/10/2017	9/12/2018	398	\$0	\$5
C-4	100 858 716	7/1/2017	7/31/2017	8/10/2017	9/12/2018	398	\$0	\$772
C-4	100 858 717	8/1/2017	8/31/2017	1/10/2018	9/12/2018	245	\$0	\$5
C-4	100 858 718	9/1/2017	9/30/2017	1/10/2018	9/12/2018	245	\$0	\$5
C-4	100 858 719	10/1/2017	10/31/2017	1/10/2018	9/12/2018	245	\$0	\$5
C-4	100 858 720	11/1/2017	11/30/2017	1/10/2018	9/12/2018	245	\$0	\$5
C-4	100 858 721	12/1/2017	12/1/2017	1/10/2018	9/12/2018	245	\$6,450	\$0
C-4	100 858 722	1/1/2018	1/31/2018	6/11/2018	9/12/2018	93	\$0	\$0
C-4	100 858 723	2/1/2018	2/28/2018	6/11/2018	9/12/2018	93	\$0	\$0
C-4	100 858 724	3/1/2018	3/31/2018	6/11/2018	9/12/2018	93	\$0	\$0
C-4	100 858 725	4/1/2018	4/30/2018	6/11/2018	9/12/2018	93	\$0	\$0
C-4	100 858 726	5/1/2018	5/31/2018	6/11/2018	9/12/2018	93	\$0	\$478
C-4	100 858 727	6/1/2018	7/16/2018	7/17/2018	9/12/2018	57	\$0	\$0
C-4	100 858 728	7/17/2018	7/30/2018	7/31/2018	9/12/2018	43	\$29,400	\$500
C-4	100 858 730	7/31/2018	8/31/2018	9/10/2018	9/12/2018	2	\$15,000	\$10
20 Late C-4 Reports						<b>4,759</b>	<b>\$50,850</b>	<b>\$2,122</b>
5,824 days late (2-579)								
Receipts on late-reported C-4 reports - \$50,850								
Late Reported Expenditures - \$2,122								

Bruce Chandler (Surplus Funds Account)

PDC Case 24627

Late C-3 Reports

Report Type	Electronic Filing Receipt Number	Date Contributions Received	Date of Deposit	C-3 Due Date	Date C-3 Filed	Days Late	Amount
C-3	100 861 182	11/26/2013	11/26/2013	12/10/2013	9/27/2018	1752	\$1,618
C-3	100 861 183	12/3/2013	12/3/2013	1/10/2014	9/27/2018	1721	\$3,900
C-3	100 861 184	7/14/2014	7/14/2014	8/11/2014	9/27/2018	1508	\$1
C-3	100 861 185	8/14/2014	8/14/2014	9/10/2014	9/27/2018	1478	\$45,000
C-3	100 861 186	12/8/2014	12/8/2014	1/12/2015	9/27/2018	1354	\$7,000
C-3	100 861 187	7/6/2015	7/6/2015	8/10/2015	9/27/2018	1144	\$3,000
C-3	100 861 188	11/27/2015	11/27/2015	12/10/2015	9/27/2018	1022	\$1,000
C-3	100 861 189	8/24/2016	8/24/2016	9/12/2016	9/27/2018	745	\$60,000
C-3	100 861 190	11/21/2016	11/21/2016	12/12/2016	9/27/2018	654	\$16,000
C-3	100 861 191	12/16/2016	12/16/2016	1/10/2017	9/27/2018	625	\$15,000
C-3	100 861 192	8/8/2018	8/8/2018	9/10/2018	9/27/2018	17	\$35,000
<b>(11 Reports)</b>						<b>12,020</b> <b>(17-1752)</b>	<b>\$187,520</b>

Bruce Chandler (Surplus Funds Account)

PDC Case 24627

Late C-4 Reports

Report Type	Electronic Filing Receipt Number	From	To	Due Date	Date Filed	Days Late	Receipts	Expenditures
C-4	100 861 203	11/1/2013	11/30/2013	12/10/2013	9/27/2018	1,752	\$1,618	\$1,225
C-4	100 861 204	12/1/2013	12/31/2013	1/10/2014	9/27/2018	1,721	\$3,900	\$777
C-4	100 861 205	1/1/2014	1/31/2014	2/10/2014	9/27/2018	1,690	\$0	\$309
C-4	100 861 206	2/1/2014	2/28/2014	3/10/2014	9/27/2018	1,662	\$0	\$369
C-4	100 861 207	3/1/2014	3/31/2014	4/10/2014	9/27/2018	1,631	\$0	\$792
C-4	100 861 208	4/1/2014	4/30/2014	5/12/2014	9/27/2018	1,599	\$0	\$571
C-4	100 861 209	5/1/2014	5/31/2014	6/10/2014	9/27/2018	1,570	\$0	\$778
C-4	100 861 210	6/1/2014	6/30/2014	7/10/2014	9/27/2018	1,540	\$0	\$608
C-4	100 861 211	7/1/2014	7/31/2014	8/11/2014	9/27/2018	1,508	\$1	\$750
C-4	100 861 212	8/1/2014	8/31/2014	9/10/2014	9/27/2018	1,478	\$45,000	\$432
C-4	100 861 213	9/1/2014	9/30/2014	10/10/2014	9/27/2018	1,448	\$0	\$35,537
C-4	100 861 214	10/1/2014	10/31/2014	11/10/2014	9/27/2018	1,417	\$0	\$5,451
C-4	100 861 215	11/1/2014	11/30/2014	12/10/2014	9/27/2018	1,378	\$0	\$464
C-4	100 861 216	12/1/2014	12/31/2014	1/12/2015	9/27/2018	1,354	\$7,000	\$371
C-4	100 861 217	1/1/2015	1/31/2015	2/10/2015	9/27/2018	1,325	\$0	\$579
C-4	100 861 218	2/1/2015	2/28/2015	3/10/2015	9/27/2018	1,297	\$0	\$883
C-4	100 861 219	3/1/2015	3/31/2015	4/10/2015	9/27/2018	1,266	\$0	\$393
C-4	100 861 220	4/1/2015	4/30/2015	5/11/2015	9/27/2018	1,235	\$0	\$310
C-4	100 861 221	5/1/2015	5/31/2015	6/10/2015	9/27/2018	1,205	\$0	\$7,269
C-4	100 861 222	6/1/2015	6/30/2015	8/10/2015	9/27/2018	1,144	\$0	\$0
C-4	100 861 223	7/1/2015	7/31/2015	8/10/2015	9/27/2018	1,144	\$3,000	\$0
C-4	100 861 224	8/1/2015	8/31/2015	10/12/2015	9/27/2018	1,081	\$0	\$42
C-4	100 861 225	9/1/2015	9/30/2015	10/12/2015	9/27/2018	1,081	\$0	\$188
C-4	100 861 226	10/1/2015	10/31/2015	11/10/2015	9/27/2018	1,052	\$0	\$5,000
C-4	100 861 227	11/1/2015	11/30/2015	12/10/2015	9/27/2018	1,022	\$1,000	\$705
C-4	100 861 228	12/1/2015	12/31/2015	9/12/2016	9/27/2018	745	\$0	\$0
C-4	100 861 229	1/1/2016	1/31/2016	9/12/2016	9/27/2018	745	\$0	\$54
C-4	100 861 230	2/1/2016	2/29/2016	9/12/2016	9/27/2018	745	\$0	\$34
C-4	100 861 231	3/1/2016	3/31/2016	9/12/2016	9/27/2018	745	\$0	\$44
C-4	100 861 232	4/1/2016	4/30/2016	9/12/2016	9/27/2018	745	\$0	\$5
C-4	100 861 233	5/1/2016	5/31/2016	9/12/2016	9/27/2018	745	\$0	\$5
C-4	100 861 234	6/1/2016	6/30/2016	9/12/2016	9/27/2018	745	\$0	\$5
C-4	100 861 235	7/1/2016	7/31/2016	9/12/2016	9/27/2018	745	\$0	\$5
C-4	100 861 236	8/1/2016	8/31/2016	9/12/2016	9/27/2018	745	\$60,000	\$0
C-4	100 861 237	9/1/2016	9/30/2016	10/10/2016	9/27/2018	717	\$0	\$60,000
C-4	100 861 238	10/1/2016	10/31/2016	12/12/2016	9/27/2018	654	\$0	\$5

Bruce Chandler (Surplus Funds Account)

PDC Case 24627

Late C-4 Reports

Report Type	Electronic Filing Receipt Number	From	To	Due Date	Date Filed	Days Late	Receipts	Expenditures
C-4	100 861 239	11/1/2016	11/30/2016	12/12/2016	9/27/2018	654	\$16,000	\$0
C-4	100 861 240	12/1/2016	12/31/2016	1/10/2017	9/27/2018	625	\$15,000	\$0
C-4	100 861 241	1/1/2017	1/31/2017	5/10/2017	9/27/2018	505	\$0	\$131
C-4	100 861 242	2/1/2017	2/28/2017	5/10/2017	9/27/2018	505	\$0	\$34
C-4	100 861 243	3/1/2017	3/31/2017	5/10/2017	9/27/2018	505	\$0	\$0
C-4	100 861 244	4/1/2017	4/30/2017	5/10/2017	9/27/2018	505	\$0	\$2,356
C-4	100 861 245	5/1/2017	5/31/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 246	6/1/2017	6/30/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 247	7/1/2017	7/31/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 248	8/1/2017	8/31/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 249	9/1/2017	9/30/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 251	10/1/2017	10/31/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 252	11/1/2017	11/30/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 253	12/1/2017	12/31/2017	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 255	1/1/2018	1/31/2018	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 257	2/1/2018	2/28/2018	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 258	3/1/2018	3/31/2018	5/10/2018	9/27/2018	140	\$0	\$0
C-4	100 861 259	4/1/2018	4/30/2018	5/10/2018	9/27/2018	140	\$0	\$1,000
C-4	100 861 260	5/1/2018	5/31/2018	9/10/2018	9/27/2018	17	\$0	\$0
C-4	100 861 261	6/1/2018	6/30/2018	9/10/2018	9/27/2018	17	\$0	\$0
C-4	100 861 262	7/1/2018	7/31/2018	9/10/2018	9/27/2018	17	\$0	\$0
C-4	100 861 263	8/1/2018	8/31/2018	9/10/2018	9/27/2018	17	\$35,000	\$0
						<b>47,723</b>	<b>\$187,520</b>	<b>\$127,482</b>
58 Late C-4 Reports								
47,723 days late (17-1,752)								
Receipts on late-reported C-4 reports - \$187,520								
Late Reported Expenditures - \$127,482								