



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: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

April 5, 2019

Delivered electronically to "russellwiita@me.com" and "brooks.sebastiani@gmail.com"

Subject: PDC Case 19239

Dear Mr. Wiita:

Below is a copy of an electronic letter sent to Ramay Donny concerning a complaint filed with the Public Disclosure Commission (PDC) against the Snohomish County GOP Leaders Fund (Committee). As noted below to Ramay Donny, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(b), however, PDC staff is hereby formally warning the officers of the Committee concerning the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities as required by PDC laws and rules for a committee under the Full Reporting Option. This formal written warning conveys staff's expectation that the Committee will fully comply with the C-3 and C-4 reporting requirements in the future should it select the Full Reporting Option or exceed the limitations of the Mini Reporting Option. The Commission will consider this formal written warning if there are any future PDC law or rule violations by the Committee.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdcc.wa.gov

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
Peter Lavalley, Executive Director





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April 5, 2019

Delivered electronically to "ramaydonny@gmail.com"

Subject: Complaint regarding Snohomish County GOP Leaders Fund, PDC Case 19239

Dear Donny Ramay:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 1, 2017. Your complaint alleged that Snohomish County GOP Leaders Fund, a continuing political committee registered with the PDC, may have violated RCW 42.17A.205 & .235 by failing to timely register as a political committee and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken under the Full Reporting option.

PDC staff reviewed your allegations, the statutes, rules and reporting requirements, the Committee Registrations (C-1pc reports), C-3 and C-4 reports, and, as a result of staff's review, found the following:

- On May 14, 2012, the Committee filed its initial C-1pc report as a New Continuing political committee, selecting the Full Reporting Option and listing Jim Donner as President and John Jennings as Vice President /Treasurer.
- In 2012, the Committee filed one C-3 report totaling \$605 in monetary contributions received, and no C-4 reports were filed. In 2013, the Committee filed a 2012 amended C-3 report and two C-4 reports for January/February 2012 disclosing zero contributions or expenditures. No C-3 or C-4 reports were filed for 2013.
- For calendar years 2013 through 2016, the Committee also filed C-1pc reports as a continuing political committee, selecting the Full Reporting Option, listing Jim Donner as President and John Jennings as Vice President/Treasurer.
- In 2014, the Committee filed two C-3 reports disclosing \$2,375 in monetary contributions received, and no C-4 reports were filed.
- In 2015, the Committee filed one, seven-page C-3 report on 1/25/2015 totaling \$6,062 for contributions received between April through December of 2014. The Committee also filed two C-3 reports, one filed on 7/22/2015 totaling \$790 for contributions received in January/February of 2015, and another C-3 report was filed on 12/28/2015 totaling \$1,270 that included the earlier \$790 plus a new \$500 contribution, and no C-4 reports.
- The Committee failed to file any C-3 or C-4 reports during calendar years 2016, 2017 and 2018.
- On February 25, 2017, Nate Nehring, a candidate for Snohomish County Council in 2017, timely filed a C-3 report disclosing \$13,285 in monetary contributions received on February

21, 2017, that included two, \$1,000 contributions received from the Committee on February 21, 2017.

- On April 24, 2017, the Snohomish County GOP Leaders Fund Committee filed a C-1pc report as a New Continuing political committee, selecting the Full Reporting Option and listing Jim Donner as President/CEO, Russell Wiita as Vice-President, and Billye Brooks-Sebastiani as Treasurer.
- As noted above, the Committee failed to file any reports during calendar years 2016 through 2018, including the \$2,000 expenditures for the monetary contribution made to the Friends of Nehring. In the response, Mr. Wiita stated the Committee filed C-3 reports in 2012, 2014, and 2015, but only for the monetary contributions received, and he acknowledged that the committee failed to file any C-4 reports disclosing any expenditures, including the \$2,000 contribution made to the Friends of Nehring.
- On or about February 6, 2019, the Committee Officers informed PDC staff that the committee currently qualifies for the Mini Reporting Option for 2019, and retroactively qualified for the Mini Reporting Option for calendar years 2016 through 2018, despite having selected the Full Reporting Option in error for the past few years.
- Political committees that receive less than \$5,000 in total contributions, receive and make less than \$5,000 in expenditures in a calendar year, and receive no more than \$500 in aggregate contributions from any single contributor qualify for the Mini Reporting Option. Political committees selecting the Mini Reporting Option are not required to file C-3 and C-4 reports disclosing contribution and expenditure activities.
- On February 14, 2019, the Committee filed a new C-1pc report for 2019, selecting the Mini Reporting Option, and three amended C-1pc reports for calendar years 2016 through 2018, changing from the Full Reporting Option to the Mini Reporting Option. The Committee also disclosed it's 2017 contribution and expenditure activities that included the \$2,000 contribution made to the Nehring campaign.

The Committee does not have any prior PDC violations or complaints that have been filed against it and is a relatively small, unsophisticated committee with modest expenditures totaling less than \$5,000 per year, which would have qualified for the Mini Reporting Option. Based on these facts, staff has determined that, in this instance, the failure to file C-3 and C-4 reports disclosing contribution and expenditure activities under the Full Reporting Option does not amount to a finding of an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), however, PDC staff is hereby formally warning the Committee concerning the importance of timely and accurately filing C-3 and C-4 reports disclosing contribution and expenditure activities as required by PDC laws and rules for a committee under the Full Reporting Option. This formal written warning conveys staff's expectation that the Committee will fully comply with the C-3 and C-4 reporting requirements in the future should it select the Full Reporting Option or exceed the limitations of the Mini Reporting Option. The Commission will consider this formal written warning if there are any future PDC law or rule violations by the Committee.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdc.wa.gov

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
Peter Lavallee, Executive Director

cc: Snohomish County GOP Leaders Fund

