



**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.pdcca.wa.gov

September 4, 2019

Sent electronically to raejourney@gmail.com

Subject: Complaints filed by David Hammond, PDC Case 43080

Dear: Rae Ann Journey, Treasurer Grant County Republican Party Central Committee,

Enclosed is a copy of an electronic letter sent to David Hammond concerning a complaint he filed with the Public Disclosure Commission (PDC) alleging the Grant County Republican Party Central Committee violated RCW 42.17A.220 by failing to timely deposit contributions received on Monetary Contributions reports (C-3 reports) within five business days of receipt.

As noted in the letter to Mr. Hammond, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Alice Fiman at (360) 586-4746, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
for Peter Lavallee
Executive Director



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September 4, 2019

Sent Electronically to David Hammond at “davidhbbcc@gmail.com”

Subject: Grant County Republican Party Central Committee, PDC Case 43080

Dear David Hammond:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed November 7, 2018.

Your complaint alleged the Grant County Republican Party Central Committee, a Bona Fide Political Party Committee, violated: (1) RCW 42.17A.220 by failing to timely deposit monetary contributions received within five business days of receipt; and (2) RCW 42.17A.235 and .240 by failing to file or timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contributions and Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken for calendar years 2015 through 2018.

For your information, on August 20, 2019, the Commission held an enforcement hearing against the Grant County Republican Central Committee (Committee), concerning the second allegation listed in your complaint. At the hearing, the Commission modified a Stipulation to Facts, Violations and Penalty, that was signed by Dan Brady, legal counsel for the party, and Peter Lavalley, PDC Executive Director.

In the Stipulation, the Committee acknowledged violating RCW 42.17 A.235 and .240 by failing to file or to timely and accurately file C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the Committee for calendar years 2015, 2016, 2017 and 2018, and for failing to maintain the Committee's books of account for a portion of the calendar year 2015. The Committee agreed to pay a \$6,500 civil penalty of which \$3,250 was suspended on several conditions resolving those allegations.

Concerning the failure to timely deposit monetary contributions, PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Rae Ann Journey, Treasurer Grant County Republican Party Central Committee, and the C-3 reports filed by the Committee. Based on staff's review, we found the following:

- The Committee is a Bona Fide County Political Party Committee located in Moses Lake, Grant County, and has been registered and reporting with the PDC dating back to the 1990's.
- On February 2, 2017, the Committee filed a Committee Registration (C-1pc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option and

listing Danny Stone as Chairman and Campaign Manager and Rae A. Journey as Committee Treasurer. The C-lpc was in effect for the remainder of 2017 and all of calendar year 2018.

- Ms. Journey stated in her response: “I have gone through all finance records and have found allegation one, failure to deposit timely contributions to be unfounded. My predecessor had told me I had 3 days to make the deposit and I strictly adhered to it.”
- Staff noted after reviewing the late-filed C-3 reports submitted by the Committee that the deposits of monetary contributions received, were listed as having been made within five days according to the deposit dates listed on the C-3 reports and Schedule A to C-4 reports.

Based on these findings staff has determined in this instance, the alleged violation of failing to timely deposit monetary contributions within five business days of receipt does not appear to be a violation warranting further investigation.

The PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
for Peter Lavalley
Executive Director