



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

August 8, 2019

PDC CASE 43080

Sent Electronically to Rae Ann Journey, Treasurer at raejourney@gmail.com

Grant County Republican Central Committee
601 S Pioneer Way, Suite F-265
Moses Lake, WA 98837

ENFORCEMENT HEARING NOTICE

Respondent: Grant County Republican Central Committee
Hearing/meeting date: August 20, 2019
Time: 1:00 p.m.
Place: Evergreen Plaza Building
711 Capitol Way, Room 206
Olympia, WA 98504

Presiding Officer: The Public Disclosure Commission
Authority: RCW 42.17A.

On the above date, the Public Disclosure Commission (PDC) will hold an Adjudicative Hearing (Enforcement hearing) concerning allegations that the Grant County Republican Central Committee violated: (1) RCW 42.17A.220 by failing to timely deposit monetary contributions within five business days of receipt; and (2) RCW 42.17A.235 by failing to file or timely file Monetary Contribution reports (C-3 reports) and Campaign Summary Receipts and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities for calendar years 2015 through 2018.

PDC staff is in the process of finalizing the Report of Investigation with Exhibits, and a Notice of Administrative Charges for an Enforcement hearing, and once those documents have been signed, I will email you PDF copies of both documents.

The Commission is scheduled to hold a hearing on the allegations to determine if actual violations occurred, and if appropriate, to assess penalties. The hearing will be conducted in accordance with the Administrative Procedures Act (APA - RCW 34) and WAC 390-37-100.

At the Enforcement hearing, the Commission may also accept a signed Stipulation to Facts, Violations, and/or Penalties (informal settlement) if one is offered and agreed to by both parties in accordance with WAC 390-37-090. If the Officers of the Grant County Republican Central Committee you would like to discuss the possibility of entering into a Stipulated Agreement, please let me know at your earliest convenience and I can assist you with that.

Grant County Republican Central Committee
PDC Case's 43080
Enforcement Hearing Notice
Page 2

The Commission has the authority to assess a penalty of up to \$10,000 per violation, or they can find apparent violations and refer the matter to the Attorney General for additional authority or higher penalties.

You are not required by law to personally attend. However, the PDC recommends that respondents personally appear whenever possible, which includes participating at the hearing by telephone conference. PDC staff will present this matter to the Commission. I have attached a PDF copy of the Enforcement Guide for your review. Let me know if you or any Grant County Republican Central Committee Officers have any questions.

Sincerely,

Alice Fiman
PDC Compliance Officer

Enclosures:

cc: Chad C. Standifer, Assistant Attorney General



State of Washington

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against

Grant County Republican Party
Central Committee, Respondent.

PDC Cases 43080

Notice of Administrative Charges

Jurisdiction

The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

Allegations

PDC staff is alleging the Grant County Republican Party Central Committee, a Bona Fide Political Party Committee, violated RCW 42.17A.235 and .240 by failing to file or to 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.

Facts

1. The Grant County Republican Party Central Committee (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.
2. 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-1pc was in effect for the remainder of 2017 and all of calendar year 2018.
3. On February 11, 2014, the Committee filed a C-1pc report as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option and listing Kimber Lybert as Chair and Campaign Manager and Sid Gregory as Committee Treasurer. The C-1pc report was in effect for the remainder of 2014, all of calendar years 2015 and 2016, and January of 2017.
4. PDC staff queried the PDC contribution database and reviewed documents filed by candidates for public office, and staff found the Grant County Republican Party Central Committee (Committee) made, at a minimum, the following monetary contributions to candidates for public office for calendar years 2016 through 2019:
 - 2016 election cycle: The Committee made three contributions totaling \$1,500 in 2016 that included a \$250 monetary contribution to Secretary of State Kim Wyman's campaign committee and two contributions to the Washington State Republican Party totaling \$1,250.
 - 2018 election cycle: The Committee made a \$500 contribution to Casey Cooper, a candidate for Grant County Treasurer.
 - 2019 election cycle: The Committee made a \$1,250 contribution to the Kittitas County Republican Party and a \$300 contribution to LSPAC.org, an Eastern Washington candidate recruitment group.

5. On February 19, 2019, the Committee filed 13 C-3 and C-4 reports detailing contribution and expenditure activities undertaken during the 2017 election year and disclosing \$34,586 in total monetary and in-kind contributions received (\$0 in funds carried forward from 2016), and \$8,628.91 in total expenditures made. These reports were filed between 405 and 739 days late.
6. On May 8, 2019, the Committee filed 12 C-3 and C-4 reports detailing contribution and expenditure activities undertaken during calendar year 2018 election year and disclosing \$30,097 in total monetary and in-kind contributions received, which included \$7,815 in funds carried forward from 2017 and \$12,758 in total expenditures made. These reports were filed between 214 and 462 days late.
7. On July 12 and 15, 2019 the Committee attempted to file its missing reports from 2015 and 2016; however, even with assistance from PDC Filer Assistance, the Committee reported experiencing challenges filing those reports using the Online Reporting of Campaign Activities (ORCA) PDC software.
8. On August 13, 2019 (the date of this Notice of Administrative Charges), the Committee filed 10 reports detailing contribution and expenditure activities undertaken covering January 1 to July 27, 2015 and disclosing \$18,183.71 in total monetary and in-kind contributions received, which included \$4,845.71 in funds carried forward from 2014, and \$6,899.18 in total expenditures made. These reports were filed between 1,645 to 1,477 days late.
9. As of the date of this Notice of Administrative Charges, the Committee had not filed the missing C-3 and C-4 reports for August through December 2015 and calendar year 2016. The Committee had also failed to file the required 2018 7-day Pre-General Election C-4 report, a 2018 Post-General Election C-4 report, and a December 2018 C-4 report, as well as any C-3 reports for contributions received and deposited by the Committee during the period October 16 through December 31, 2018.

10. Most of the Committee's contributions received each year were from individuals that are Grant County Republican Party Officers, PCO's, members, and residents, along with the proceeds from an annual Lincoln Day Dinner auction and other low-cost fundraising events.
11. Most of the Committee's expenditures each year are for party building activities and administrative expenses, costs associated with the annual Lincoln Day Dinner, and the costs associated with local fairs and festivals.

Laws and Rules

RCW 42.17A.235 and **RCW 42.17A.240** require political committees 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.

Respectfully submitted this 13th day of August 2019.


Peter Lavalley
PDC Executive Director



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 42.17 and RCW 42.17A

Grant County Republican Party
Central Committee
Respondent.

PDC Case 43080

Report of Investigation

I. Background, Complaint and Allegations

- 1.1 The Grant County Republican Party Central 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.
- 1.2 On February 11, 2019, the Grant County Republican Party Central Committee (Committee) filed an amended Committee Registration (C-lpc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option and listing Rae A. Journey as Campaign Manager and Treasurer. The C-lpc report also listed Barbara Morgan as Chair, Arlin Hope as Vice Chair and Pat Weber as Secretary. **Exhibit #1.**
- 1.3 On February 2, 2017, Grant County Republican Party Central Committee filed a C-lpc 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 report also listed Barbara Morgan as Committee Vice-Chair and Pete Knittle as Committee Secretary. **Exhibit #2.**
- 1.4 On February 11, 2014, Grant County Republican Party Central Committee filed a C-lpc report as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option and listing Kimber Lybert as Chair and Campaign Manager and Sid Gregory as Committee Treasurer. The C-lpc report also listed Eric Hildebrand as Committee Vice-Chair, Casey Cooper as State Committeeman and Susan Freeman as State Committeewoman. **Exhibit #3.**
- 1.5 On November 7, 2018, David Hammond filed a complaint (**Exhibit #4**) with the PDC alleging that the Grant County Republican Party Central Committee violated:
 - RCW 42.17A.220 by failing to timely deposit monetary contributions received within five business days of receipt; and

- 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.
- 1.6 On January 31, 2019, the PDC conducted an Initial Hearing (Case Status Review) and opened a Formal Investigation against the Grant County Republican Party Central Committee.
- 1.7 The Committee has no prior PDC violations but was issued a formal written warning letter regarding missing PDC reports in 2014.

II. Investigative Findings

- 2.1 Bona fide political party committees that were registered with the PDC during calendar years 2014 through 2018, selected the Full Reporting option, and participated in a primary and/or general election by: (1) making contributions or independent expenditures to support or oppose candidates or ballot propositions; (2) endorsing candidates or ballot propositions; or (3) making contributions to a political committee, including caucus and caucus-related political committee or political party organizations, were required to file the following C-3 and C-4 reports:
- All monetary contributions received by a political committee must be deposited into the committee bank account within five business days of receipt, and each committee is required to file one C-3 report for each bank deposit.
 - Monthly C-3 reports are due to be filed by the 10th of each month disclosing contributions received and deposited during the previous calendar month for the periods January 1 through May 31, and the day after the general election is held through December 31 of each calendar year. Beginning June through the day prior to the general election being held, weekly C-3 reports are required to be filed every Monday for contributions received and deposited during the previous five business days.
 - Monthly C-4 reports are required to be filed for the periods January 1 through May 31, and December 1 through 31, and are due to be filed by the 10th of the month if \$200 in contributions has been received or \$200 in expenditures have been made since the last C-4 report was filed.
 - A 21-day Pre-Primary Election C-4 report, a 7-day Pre-Primary Election C-4 report and a Post-Primary Election C-4 report for each calendar year.
 - A 21-day Pre-General Election C-4 report, a 7-day Pre-General Election C-4 report and a Post-General Election C-4 report for each calendar year.
- 2.2 State law requires political committees under the Full Reporting option to accurately file C-3 and C-4 reports disclosing contribution and expenditure information, including the name and address of each person to whom an expenditure was made in the aggregate amount of more than fifty dollars during the period covered by this report, the amount, date, and a detailed description or purpose of each expenditure, and the total sum of all

expenditures. In addition, PDC rules and reporting requirements require political committees to identify any candidate supported or opposed by an expenditure, and to provide the purpose and the goods or services provided by the expenditure.

- 2.3 PDC staff queried the PDC contribution database and reviewed documents filed by candidates for public office, and found the Grant County Republican Party Central Committee (Committee) made 11 monetary contributions to candidates for public office for calendar years 2012 through 2019, as follows:
- 2012 election cycle: The Committee made a total of \$1,000 in contributions to five 2012 candidates for public office and included \$200 to each of the following candidates: James H. Watkins, Richard B. Sanders, Clint B. Didier, Carol A. Swartz and Kim Wyman.
 - 2016 election cycle: The Committee made three contributions totaling \$1,500 in 2016 that included a \$250 monetary contribution to Kim Wyman and two contributions to the Washington State Republican Party totaling \$1,250.
 - 2018 election cycle: The Committee made a \$500 contribution to Casey Cooper, a candidate for Grant County Treasurer.
 - 2019 election cycle: The Committee made a \$1,250 contribution to the Kittitas County Republican Party and a \$300 contribution to LSPAC.org, an Eastern Washington candidate recruitment group.
- 2.4 The Committee failed to file any C-3 or C-4 reports for the 2015 or 2016 election years.
- 2.5 At the time the complaint was filed in November of 2018, no C-3 or C-4 reports had been filed for calendar year 2018, and only eight C-3 reports for calendar year 2017 covering the period January 1 through April 25, 2017 had been filed. Those eight C-3 reports totaled \$12,404 in monetary contributions received mostly as proceeds from the Lincoln Day Dinner, plus \$3,225 in funds carried forward from 2017. No C-4 reports had been filed for calendar year 2017.
- 2.6 On February 19, 2019, the Committee filed 13 C-3 and C-4 reports detailing contribution and expenditure activities undertaken during the 2017 election year and disclosing \$34,586 in total monetary and in-kind contributions received (\$0 in funds carried forward from 2016), and \$8,628.91 in total expenditures made. These reports were filed between 405 and 739 days late.
- 2.7 On May 8, 2019, the Committee filed 12 C-3 and C-4 reports detailing contribution and expenditure activities undertaken during the calendar year 2018 election year and disclosing \$30,097 in total monetary and in-kind contributions received, which included \$7,815 in funds carried forward from 2017, and \$12,758 in total expenditures made. These reports were filed between 214 and 462 days late.
- 2.8 On July 12 and 15, 2019 the Committee attempted to file its missing reports from 2015 and 2016; however the Committee reported experiencing challenges filing those reports using the Online Reporting of Campaign Activities (ORCA) PDC software.

- 2.9 On August 13, 2019 (the date of this Report of Investigation), the Committee filed 10 reports detailing contribution and expenditure activities undertaken covering January 1 to July 27, 2015 and disclosing \$18,183.71 in total monetary and in-kind contributions received, which included \$4,845.71 in funds carried forward from 2016, and \$6,899.18 in total expenditures made. These reports were filed between 1,645 to 1,477 days late.
- 2.10 As of the date of this Report of Investigation, the Committee has failed to file the 7-day Pre-General Election C-4 report, a Post-General Election C-4 report, and any C-3 reports for contributions received and deposited covering the period October 16 through December 31, 2018.
- 2.11 The chart below summarizes the contribution and expenditure activities, and timeliness of reporting, undertaken by the Committee for calendar years 2014 to present.

| Calendar Year | Total Contributions | Total Expenditures | Days Late | Major Expenditures/Staff Comments |
|---------------|---------------------|--------------------|---------------------|--|
| 2019 | \$22,915 | \$14,318 | 28 | Lincoln Day Dinner, "MAGA" merchandise, \$1,250 contribution to Kittitas Co. Repub. Contribution totals include \$13,922 carried forward from 2018. January 2019 C-3 and C-4 reports are the only late filed reports (28 days late). |
| 2018 | \$30,097 | \$12,758 | 214-462 | Lincoln Day Dinner, "MAGA" merchandise, \$800 contribution to Repub. Women of Grant Co. Contribution total includes \$7,815 in funds carried forward from 2017. Missing C-3 and C-4 reports for 10/16 through 12/31. |
| 2017 | \$34,586 | \$8,629 | 405-739 | Lincoln Day Dinner. \$0 carried forward from prior year. |
| 2016 | \$0 | \$0 | TBD | No C-3 or C-4 reports filed. |
| 2015 | \$18,183.71 | \$6,899.18 | 1,645 - 1,477 | Lincoln Day Dinner. |
| 2014 | \$16,321 | \$9,422 | N/A | Includes \$5,104 carry-forward; Lincoln Day Dinner, \$250 contribution to Casey Cooper, and a \$400 contribution to Repub. Women of Grant Co. |

- 2.12 On December 10, 2018, Ms. Journey responded to the complaint on behalf of the Committee stating that the Grant County Republican Party is "an all-volunteer organization that reorganizes every 2 years pursuant to RCW 29A.80.030." **Exhibit #5.** She stated that the party, its Officers and members takes compliance with the PDC reporting requirements for a political party committee very seriously, and added she was elected Party Treasurer in December of 2016. She stated that prior to taking office as Committee Treasurer, she was trained by the previous party Treasurer, Lucinda West.
- 2.13 Ms. Journey stated that upon review of the complaint, the Committee's records, and the PDC laws, rules and reporting requirements for a committee "it appears that we may have some discrepancies as detailed in the complaint." She stated that her review found one instance in which the Committee failed to timely deposit monetary contributions within five business days of receipt and added that her "predecessor had told me I had 3 days to make the deposit and I strictly adhered to it."

Grant County Republican Central Committee
Report of Investigation
PDC Case 43080
Page 6

Respectfully submitted this 13 day of August 2019.



Alice Fiman
PDC Compliance Officer

List of Exhibits

- Exhibit #1** Grant County Republican Party Central Committee amended 2019 Committee Registration
- Exhibit #2** Grant County Republican Party Central Committee 2017 Committee Registration
- Exhibit #3** Grant County Republican Party Central Committee 2014 Committee Registration
- Exhibit #4** Complaint filed by David Hammond November 7, 2018
- Exhibit #5** December 10, 2018 complaint response from Rae A. Journey on behalf of Grant County Republican Party Central Committee.

- 2.14 Ms. Journey stated that upon reviewing the Committee's Online Reporting of Campaign Activities (PDC ORCA software) files and the Committee's C-3 and C-4 reports on the PDC website, "we (the Committee) may have some discrepancies as detailed in the complaint." She stated that the Committee entered contribution and expenditure information into the ORCA program, but did confirm no C-3 or C-4 reports were available on the PDC website.

III. Scope

- 3.1 PDC staff reviewed the following:

- The complaint and exhibits filed November 7, 2018 by David Hammond.
- Telephone conversations and email communications between PDC staff and Rae A. Journey, representing the Grant County Republican Party Central Committee.
- The PDC contribution and expenditure database for the Grant County Republican Party Central Committee.
- The PDC database for candidates or political committees reporting contributions from the Grant County Republican Party Central Committee.
- PDC reports filed in 2019 by the Committee. The reports were filed on February 11, February 19, March 11, March 13, April 10, May 8, May 9, June 10, July 9, July 12 and July 15.

- 3.2 Chronology of PDC staff's attempted contacts with the Committee concerning the complaint:

- Ten Emails and nine phone calls between Commission staff and Committee representatives between November 16, 2018 and July 31, 2019.

IV. Statutes

- 4.1 **RCW 42.17A.220** requires all monetary contributions received by a political committee to be deposited into the committee bank account within five business days of receipt.
- 4.2 **RCW 42.17A.235 and 240** require continuing political committees to file timely and accurate C-3 and C-4 reports disclosing contribution and expenditure activities undertaken by the committee. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. Beginning June 1st for every political committees participating in an election, C-4 reports are required 21 and 7 days before each election in which the committee receives contributions or makes expenditures, and in the month following the election. Monetary contributions are reported weekly during this same time and are required to be disclosed on a C-3 report filed every Monday for monetary contributions deposited into the committee bank account the previous five business days.

Exhibit 1

Exhibit 1- Page 1 of 2

Exhibit 2

Exhibit 2 - Page 1 of 2

| | | | | | | | |
|--|--|--|--|--|--|---|--|
|  PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 753-1111 Toll Free 1-877-601-2828 | | Political Committee Registration | | C1PC (1/12) | | 100746853 02-02-2017 | |
| Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) GRANT COUNTY REPUBLICANCENTRAL COMMITTEE | | | | Acronym: | | | |
| | | | | Telephone: 509--750--4263 | | | |
| Mailing Address 601 S PIONEER WAY SUITE F 265 | | | | Fax: | | | |
| City MOSES LAKE | | County GRANT | | Zip + 4 98837 | | E-mail: BILLSLUCYML@GMAIL.COM | |
| NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form. | | COMMITTEE STATUS <input checked="" type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input type="checkbox"/> _____ election year only. Date of general or special election: _____ (Year) | | | | | |
| 1. What is the purpose or description of the committee? <input checked="" type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support, | | | | | | | |
| <input type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: | | | | | | Ballot Number _____ FOR <input type="checkbox"/> AGAINST <input type="checkbox"/> | |
| <input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name: | | | | | | | |
| For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, identify the party: | | | | | | | |
| 2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet. | | | | | | | |
| 3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor. | | | | | | | |
| | | | | | | <input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required. | |
| 4. Campaign Manager's or Media Contact's Name and Address DANNY STONE 601 S PIONEER WAY, MOSES LAKE WA 98837 | | | | | | Telephone Number: 509-750-4263 | |
| 5. Treasurer's Name and Address. Does treasurer perform <u>only</u> ministerial functions? Yes ___ No <input checked="" type="checkbox"/> See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. RAE ANNE JOURNEY 601 S PIONEER WAY, MOSES LAKE WA 98837 | | | | | | Daytime Telephone Number: 509-760-6227 | |
| 6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. LUCINDA WEST, MINISTERIAL, 13284 ROAD 4 NE, MOSES LAKE WA 98837 | | | | | | <input type="checkbox"/> Continued on attached sheet. | |
| 7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." DANNY STONE CHAIRMAN, CHAIRMAN, 601 S PIONEER WAY STE F 265, MOSES LAKE WA 98837 | | | | | | <input type="checkbox"/> Continued on attached sheet | |
| 8. Campaign Bank or Depository WASHINGTON TRUST BANK | | Branch MOSES LAKE | | City MOSES LAKE WA | | | |
| 9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 601 S PIONEER WAY SUITE F 265, MOSES LAKE In order to make an appointment, contact the campaign at (telephone, fax, e-mail): (509) 750-4263 BILLSLUCYML@GMAIL.COM | | | | | | | |
| 10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input checked="" type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates. | | | | 11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature RAE ANNE JOURNEY | | | |
| | | | | Date 02-02-2017 | | | |

Exhibit 3

Exhibit 3 - Page 1 of 2

| | | | | | |
|--|------------------------|--|---------------------------------|---|--------------------------------------|
|  PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 783-1111 Toll Free 1-877-601-2828 | | Political Committee Registration | | C1PC (1/12) | DATE FILED PDC FEB 11 2014 |
| Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) GRANT COUNTY REPUBLICAN CENTRAL COMMITTEE | | | | Acronym: G | Telephone: (509) 760-4613 |
| Mailing Address PMB 265, 601 S. PIONEER WAY, STE F | | | | Fax: () | |
| City MOSES LAKE | County GRANT | Zip +4 98837 | E-mail: Bentiger@POL.com | | |
| NEW OR AMENDED REGISTRATION? <input type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form. | | COMMITTEE STATUS <input checked="" type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input type="checkbox"/> _____ election year only. Date of general or special election: _____ (Year) | | | |
| 1. What is the purpose or description of the committee? <input checked="" type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support. <input type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: _____ Ballot Number _____ FOR <input type="checkbox"/> AGAINST <input type="checkbox"/> <input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name: _____ | | | | | |
| For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, identify the party: _____ | | | | | |
| 2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet. | | | | | |
| 3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor. <input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required. | | | | | |
| 4. Campaign Manager's or Media Contact's Name and Address KIMBERLY BOBERT 877 EASY STREET, MOSES LAKE, WA 98837 | | | | Telephone Number: (509) 989-7619 | |
| 5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes ___ No <input checked="" type="checkbox"/> See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. <input type="checkbox"/> Continued on attached sheet. | | | | Daytime Telephone Number: (509) 760-4613 | |
| 6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet. | | | | | |
| 7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." ERIC HILDEBRAND, VICE-CHAIRMAN, 12747 RD FNW, EPHRATA, WA 98823 <input type="checkbox"/> Continued on attached sheet. CASEY L. COOPER, STATE COMMITTEEMAN, 1424 S HAMILTON RD NE, MOSES LAKE, WA 98837 SUSAN FREEMAN, STATE COMMITTEEWOMAN, PO BOX 537, MOSES LAKE, WA 98837 | | | | | |
| 8. Campaign Bank or Depository WASHINGTON TRUST BANK | | Branch EPHATA | City EPHATA | | |
| 9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 9581 RD H4NE, MOSES LAKE, WASHINGTON 509-760-4613 In order to make an appointment, contact the campaign at (telephone, fax, e-mail): () Bentiger@POL.com | | | | | |
| 10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates. | | | | 11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature Sid Shury Date 2/10/14 | |

SEE INSTRUCTIONS ON NEXT PAGE

Exhibit 4

Exhibit 4 - Page 1 of 5

Complaint Description

File a Formal Complaint - David Hammond

[Davidhbbcc](#) (Wed, 7 Nov 2018 at 3:35 PM)

Complaint Description

File a Formal Complaint -

David Hammond

To Whom it May Concern

It has come to my attention that the Grant County Republican Central Committee (hereafter collectively referred to as "respondent") has habitually and willfully committed frequent and multiple violations of RCW 42.17A.

2018

Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed to post any reports for 2018 as can be seen on the PDC website for 2018.

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2018

2017

Rae Anne Journey Treasurer

Failure to file accurate C4 reports (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of expenditures and debt (C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). Unfortunately, the respondent has

failed to post any C4 reports for 2017 as can be seen on the PDC website for 2017

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2017

2016

Sid Gregory Treasurer

No reports, however, committee sponsored Lincoln fundraiser 2/27/2016

<https://www.facebook.com/events/203197593364018>

Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed to post any reports for 2016 as can be seen on the PDC website for 2016.

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2016

2015

Sid Gregory, Treasurer

Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed to post any reports for 2015 as can be seen on the PDC website for 2015.

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2015

What impact does the alleged violation(s) have on the public?

Alleged Violation of RCW 42.17A.220, .235, .240 for for failure timely or accurately file contribution or expenditure reports and failure to timely deposit contributions.

List of attached evidence or contact information where evidence may be found.

2018

Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports

of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed to post any reports for 2018 as can be seen on the PDC website for 2018. https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2018

2017

Rae Anne Journey Treasurer

Failure to file accurate C4 reports (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of expenditures and debt (C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). Unfortunately, the respondent has failed to post any C4 reports for 2017 as can be seen on the PDC website for 2017

. https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2017

2016

Sid Gregory Treasurer

No reports, however, committee sponsored Lincoln fundraiser 2/27/2016

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Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

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https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2016

2015

Sid Gregory, Treasurer

Failure to file accurate, timely C3 and C4 reports, failure to timely deposit contributions. (Violation of RCW 42.17A.235, .220)

State law requires that candidates and committees file frequent, accurate, reports of contributions, expenditures, in-kind contributions, debt, pledges, and loans (C3s and C4s). The reports must be compliant with both state law and PDC regulations (WAC 390). State law also requires that contributions must be deposited within 5 business days of receipt. Unfortunately, the respondent has failed to post any reports for 2015 as can be seen on the PDC website for 2015.

https://www.pdc.wa.gov/browse/campaign-explorer/committee?filer_id=GRANRC%20357&election_year=2015

List of potential witnesses with contact information to reach them.

Treasurer:

JOURNEY, RAE ANNE
601 S PIONEER WAY
MOSES LAKE, WA 98837
5097606227

GREGORY, SID
9581 RD H.4 NE
MOSES LAKE, WA 98837
5097604613

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Exhibit 5

Exhibit 5 - Page 1 of 2

GCRP Response to complaint

RaeAnne Journey (Fri, 30 Nov 2018 at 4:20 PM)

Public Disclosure Commission,

I am writing in response to PDC Case #43080, a complaint filed by David Hammond against the Grant County Republican Party. I would like to ensure the Commission that we take compliance with the PDC very seriously. We are an all-volunteer organization that reorganizes every 2 years pursuant to RCW 29A.80.030.

I was elected Treasurer in December of 2016. Prior to taking office, I was trained by the previous Treasurer, Lucinda West. Upon review of the complaint, our organization's records, and the law and regulations, it appears that we may have some discrepancies as detailed in the complaint. 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.

Upon reviewing ORCA and the PDC website, I have found that Allegation 2, failure to timely report contributions and expenditures. Reports were generated in ORCA but not available on the PDC website.

I will be reaching out to the Commission on Monday to find a solution as to why the reports are stuck in Que as I am suspecting.

I am looking forward to further dialogue of how we can rectify this situation so that moving forward we can be in full compliance.

Respectfully,

RaeAnne Journey, Treasurer
Grant County Republican Party