



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

July 30, 2019

Delivered electronically to "mountainsnow08@gmail.com"

Subject: PDC Case 53230

Dear Daniel R. Miller:

Below is a copy of an electronic letter sent to Lynda Gerpheide concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Lynda Gerpheide, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about the importance of timely filing a Candidate Registration (C-1 report) and Personal Statement of Financial Affairs (F-1 report) with the PDC within two weeks of declaring candidacy. PDC staff expects that you will timely file all required PDC reports, including C-1 and F-1 reports, in future years in accordance with PDC laws and rules. The Respondent is further reminded of the necessity of responding quickly to PDC requests for missing reports, especially during an election year, so the public is not deprived of critical information.

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

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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July 30, 2019

Delivered electronically to "lyndaleeagerpheid@hotmail.com"

Subject: Complaint regarding Daniel R. Miller, PDC Case 53230

Dear Lynda Gerpheide:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 13, 2019. Your complaint alleged that Daniel R. Miller (the "Respondent") may have violated RCW 42.17A.205 & .770 by failing to timely register as a candidate and file a statement of financial affairs for election year 2019.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response(s) provided by Respondent; and the applicable PDC reports filed by Respondent to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Respondent is a candidate for State Senator, Leg. District 40. The Respondent was also a candidate in 2014, 2015, 2016 and 2018. Although not a first-time candidate, the Respondent has limited filing experience due to the small size of his previous campaigns and status as a mini-reporter.
- Candidates are required to register with the PDC within two weeks of becoming a "candidate," as defined in RCW 42.17A.005(9) and WAC 390-05-200. Pursuant to RCW 42.17A.205, candidate committees are required to register with the PDC within two weeks of 1) being organized; or 2) first having the expectation of receiving contributions or making expenditures, whichever comes first. The Candidate Registration (C-1 report) serves the dual purpose of registering both the candidate and the candidate's committee. The C-1 report for 2019 candidates was due June 1, 2019.
- The Respondent attempted to file a Candidate Registration (C-1 report) with the PDC on June 26, 2019 but the submission was incomplete. The Respondent successfully filed the C-1 report on July 17, 2019 and selected the mini-reporting option. Mini-reporters are not required to submit C-3 and C-4 reports to the PDC disclosing campaign contributions and expenditures.
- Pursuant to RCW 42.17A.700, every candidate is required to file a statement of financial affairs with the PDC, certifying financial activity for the preceding twelve months, within two weeks of becoming a candidate. The 2019 F-1 report, certifying financial activity for 2018, was due for candidates on June 1, 2019.

- The Respondent filed a Personal Statement of Financial Affairs (F-1 report) with the PDC on June 28, 2019.
- The Respondent was notified of the missing C-1 and F-1 reports on June 17, 2019 and responded to the PDC within 9 days. He made a good-faith effort to resolve the issue by filing the missing F-1 report within 11 days of being notified. An early attempt was made to file the C-1 report online, but the Respondent experienced technical difficulties completing the submission. The Respondent's C-1 report was filed with the PDC 30 days after the case was opened.
- The Respondent does not have any prior violations with the PDC.

Based on these findings, staff has determined that, in this instance, failure to timely file the Candidate Registration (C-1) and Personal Statement of Financial Affairs (F-1) reports does not amount to a violation warranting further investigation.

PDC staff is reminding Daniel Miller about the importance of the timely filing all future PDC reports, including the candidate registration and financial affairs statement, and responding quickly to PDC requests.

Based on this information, 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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Daniel R. Miller