



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

July 24, 2019

Delivered electronically to "[ramon@ldesinc.com](mailto:ramon@ldesinc.com)"

Subject: PDC Case 53461

Dear Ramon Llanos:

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

As noted below to Amanda Zimmerman, 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.

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 [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Tabatha Blacksmith  
Compliance Coordinator

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

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July 24, 2019

Delivered electronically to "[azimmerman506@gmail.com](mailto:azimmerman506@gmail.com)"

Subject: Complaint regarding Ramon Llanos, PDC Case 53461

Dear Amanda Zimmerman:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 20, 2019. Your complaint alleged that Ramon Llanos (the "Respondent") may have violated RCW 42.17A.205, .700 & .235 by failing to register as a candidate and file a financial affairs statement within two weeks of declaring candidacy and timely report contributions & expenditures.

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

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

- The Respondent is a first-time candidate for Ferndale City Council, position 7.
- 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 filed a Candidate Registration (C-1 report) with the PDC on June 26, 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 attempted to file a Personal Statement of Financial Affairs (F-1 report) with the PDC on June 27, 2019 but it was incomplete. The Respondent successfully filed an F-1 report on July 10, 2019.

- Upon being notified of the missing C-1 and F-1 reports on June 21, 2019, the Respondent quickly replied and made a good-faith effort to resolve the issue by filing the missing C-1 report within 5 days and attempting to file the F-1 report within 6 days.
- Mitigating factors include: The Respondent is a first-time filer whose late reports were the result of a good-faith omission. The Respondent's campaign is relatively small and unsophisticated and, upon request, took corrective action to ensure compliance.

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 Ramon Llanos about the importance of the timely filing all future PDC reports, including the candidate registration and financial affairs statement.

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](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_  
Tabatha Blacksmith  
Compliance Coordinator

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Ramon Llanos