



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 7, 2019

Delivered electronically to Glen Morgan at glen@wethegoverned.com

Subject: Complaint regarding Citizens for Ridgefield Schools, PDC Case 54858

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 17, 2019. Your complaint alleged that the Citizens for Ridgefield Schools, may have violated RCW 42.17A.220(4) for accepting over limit anonymous contributions.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Citizens for Ridgefield Schools; and reviewed their data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On November 16, 2015, the Citizens for Ridgefield Schools timely filed a Committee Registration (C-1pc report) as a Ballot Committee (Levy), selecting the Full Reporting Option, and listing Jim Maul and Tevis Laspa as Campaign Manager and Treasurer, respectively.
- RCW 42.17A.220(4) states in part that “accumulated unidentified contributions in excess of one percent of the total accumulated contributions received in the current calendar year, or three hundred dollars, whichever is more, may not be deposited, used, or expended, but shall be returned to the donor if his or her identity can be ascertained. If the donor cannot be ascertained, the contribution shall escheat to the state and shall be paid to the state treasurer for deposit in the state general fund.”
- On its website, the PDC guidance outlines the amount of anonymous contribution(s) a committee may accept in a calendar year.
- The complaint alleged that in calendar year 2016, the Citizens for Ridgefield Schools accepted anonymous contributions in the amount of \$4,681, which is \$4,381 more than the allowable anonymous contribution limit of \$300.
- In its response to this allegation, the Citizens for Ridgefield Schools, by way of its current treasurer, Mike Bomar, stated... “I have reviewed the paperwork from our 2016 campaign, and it appears a small amount of that was from \$15 donations made at various times throughout the year. The larger sum appears to be from our January auction and fundraiser that year. Looking at our records, it is clearly a series of auction item purchases and mostly paddle raises that were paid for with cash that was lumped together, but not deposited

as individual donations. There were over 100 items in the auction.” Mr. Bomar further stated “since receiving the complaint, our committee, most of whom were not part of the group in 2016, has voted to no longer accept any anonymous donations of any amount going forward. We would also appreciate any opportunities to receive regular trainings or updates on PDC regulations so that this type of oversight does not occur in the future. We will recreate the auction in order to filter out which items were reported as cash and re-attribute to better reflect the source of the funds.”

- Staff review of the Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports), including the amended reports filed by the Citizens for Ridgefield Schools found the committee accepted \$81 in actual anonymous contribution which is below the statutory threshold of \$300.

Based on these findings, staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

However, staff is reminding the Citizens for Ridgefield Schools about the importance of filing accurate C-3 and C-4 reports in the future to reflect the actual/true source of contributions received by the committee.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Citizens for Ridgefield Schools

