



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)

September 16, 2019

Delivered electronically to "[rrob1034@gmail.com](mailto:rrob1034@gmail.com)"

Subject: PDC Case 54972

Dear Richard W. Robinson:

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

As noted below to Glen Morgan, 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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September 16, 2019

Delivered electronically to "[glen@wethegoverned.com](mailto:glen@wethegoverned.com)"

Subject: Complaint regarding Richard W. Robinson, PDC Case 54972

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 16, 2019. Your complaint alleged that Richard W. Robinson (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 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 Port Angeles City Council who filed with Elections as a candidate on May 17, 2019. Although not a first-time candidate, the Respondent has limited filing experience due to the small size of his previous campaign 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 no later than June 1, 2019.
- The Respondent filed a Candidate Registration (C-1 report) with the PDC on September 1, 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 no later than June 1, 2019.

- The Respondent filed a Personal Statement of Financial Affairs (F-1 report) with the PDC on June 20, 2019.
- PDC staff notified the Respondent of the complaint filed against him and the missing C-1 report by email on July 19, 2019 but did not receive a response; staff resent this information to the Respondent at a different email address on August 26, 2019 and received a response within 24 hours.
- In his response, the Respondent indicated that a severe injury in July and subsequent medical treatment contributed to the late C-1 report. He also stated that he was not aware of the complaint and missing report until August 27, 2019. The Respondent made a good-faith effort to resolve the issue by filing the missing C-1 report within 6 days of being resent the information.
- Aggravating factors include: The Respondent's late C-1 report was received 26 days after the Primary Election.
- Mitigating factors include: The Respondent's late reports were the result of a good-faith omission, which he took steps to remedy. A personal emergency or illness of the Respondent contributed to noncompliance. The Respondent's campaign is relatively small and unsophisticated, and he has limited filing experience due to his status as a mini-reporter. 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 report) and Personal Statement of Financial Affairs (F-1 report) do not amount a violation warranting further investigation.

PDC staff is reminding Richard Robinson about the importance of timely filing all future PDC reports, including the candidate registration and statement of financial affairs.

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 Lavalley  
Executive Director

cc: Richard Robinson