



**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 26, 2019

Delivered electronically to "cws3rd@hotmail.com"

Subject: Complaint filed by Amy Conway, PDC Case 57038

Dear Charles Smith III:

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

As noted in the letter to Amy Conway, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to timely file your Candidate Registration reports (C-1 report), Personal Financial Affairs Statement reports (F-1 report) and disclosure of all Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports). PDC staff expects you to timely register as a candidate and report financial affairs, contributions and expenditures in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

---

Tabitha Townsend  
Compliance Coordinator

Endorsed by,

/s

---

Peter Lavalley  
Executive Director



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

September 26, 2019

Delivered electronically to “amyrex1902@aol.com”

Subject: Complaint regarding Charles Smith III, PDC Case 57038

Dear Amy Conway:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 5, 2019. The complaint alleged that Charles Smith III, a candidate for School Director, for Sequim SD 323 may have violated RCW 42.17A.205, .210 and .215 for failure to timely file their Candidate Registration (C-1 report) and failure to disclose their treasurer and depositories; RCW 42.17A.700 for failure to timely file their Personal Financial Affairs Statement report (F-1 report); and RCW 42.17A.235 for failure to timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports).

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; 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:

- Pursuant to RCW 42.17A.205, .210 and .215 the Respondent was required to file their C-1 report within two weeks of becoming a candidate, the Respondent filed with Clallam County on May 17, 2019 for their candidacy; making their filing deadline not later than May 31, 2019.
- The Respondent filed their C-1 report on September 9, 2019, which was 101 days beyond the statutory deadline of RCW 42.17A.205, and 34 days after the Primary Election held on August 6, 2019.
- Pursuant to RCW 42.17A.700 the Respondent was required to file their F-1 report within two weeks of becoming a candidate, or no later than May 31, 2019.
- The Respondent filed their F-1 report on September 9, 2019, which was 101 days beyond the statutory deadline of RCW 42.17A.205, and 34 days after the Primary Election held on August 6, 2019.
- On the C-1 report filed on September 9, 2019, the Respondent chose the Mini Reporting option as provided by WAC 390-16-105, which exempted them from the requirement in RCW 42.17A.235 to file regular C-3 and C-4 reports, provided the Campaign accepts no more than \$500 from any single source, and raises and spends no more than \$5,000 over the course of the Campaign.
- The Respondent did not appear on the ballot for the Primary Election and will appear on the ballot for the General Election.

Based on our findings staff has determined that, in this instance, failure to timely file the C-1 and F-1 reports does not amount to a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), Charles Smith III will receive a formal written warning concerning failure to timely file their Candidate Registration (C-1 report), Personal Financial Affairs Statement (F-1 report) and disclosure of all Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports). The formal written warning will include staff's expectation that Charles Smith III timely register as a candidate and report financial affairs, contributions and expenditures in the future. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s

---

Tabitha Townsend  
Compliance Coordinator

Endorsed by,

/s

---

Peter Lavalley  
Executive Director

cc: Charles Smith III