



**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)**

October 16, 2019

Delivered electronically to "treasurer@clarkrepublicans.com"

Subject: Complaint filed by Park Llafet, PDC Case 57544

Dear Clark County Republican Central Committee:

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

As noted in the letter to Park Llafet, 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.

PDC staff is reminding you about the importance of timely depositing contributions into the designated depository within five business days of receipt. PDC staff expects that the Clark County Republican Central Committee will deposit contributions prior to using them to make expenditures in the future.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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October 16, 2019

Delivered electronically to "llafet4@gmail.com"

Subject: Complaint regarding the Clark County Republican Central Committee (4),  
PDC Case 57544

Dear Park Llafet:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 13, 2019. The complaint alleged that the Clark County Republican Central Committee (Respondent), a bona fide political party, may have violated RCW 42.17A.220 for failure to deposit anonymous contributions within five business days of receipt; RCW 42.17A.235 for failure to report anonymous contributions; and RCW 42.17A.240 for failure to accurately and completely report contributions, expenditures, reimbursements, and in-kind contributions.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On August 27, 2019, the Respondent held a recall meeting for their Chair at the Bethesda Church in Vancouver, organized by yourself as Secretary for the Party.
- In your capacity as an officer for the Respondent, you arranged for a \$150 rental space with the Bethesda Church, and the services of a parliamentarian valued at \$350.
- At the August 27, 2019 recall meeting, the Respondent collected \$152.50 in anonymous cash contributions, and \$150 of the collected contributions were delivered to you in your capacity as an officer for the Respondent to pay for the value of the \$150 rental of Bethesda Church that evening, rather than first being deposited within five business days of receipt, as required by RCW 42.17A.220.
- At the August 27, 2019 recall meeting, name badges, envelopes, and paper were provided to attendees, for which no receipts or statements were collected by the Respondent, as required by RCW 42.17A.235.
- On August 28, 2019, you paid the \$350 fee for the services of the parliamentarian out of your personal funds, making an in-kind contribution to the Respondent.
- On September 10, 2019, the Respondent timely filed a Summary Full Report of Receipts and Expenditures (C-4 report), disclosing an expenditure of \$150 for the value of the Bethesda Church rental, a \$350 in-kind contribution from yourself for the value of the

parliamentarian's services, and an in-kind contribution of \$292 from yourself for the value of supplies for which no receipt or statements were collected by the Respondent.

- The response to the complaint provides documentation to demonstrate the Respondent's good-faith effort to comply with the reporting requirements of RCW 42.17A.240, using the value of comparable items at Office Depot to make a good-faith estimate of the fair market value of supplies, reported as a \$292 in-kind contribution from yourself.
- On October 10, 2019, the Respondent filed a Cash Receipts and Monetary Contributions report (C-3 report), disclosing \$152.50 in anonymous contributions received on August 27, 2019, and deposited on September 5, 2019, two days beyond the statutory requirement of RCW 42.17A.220 to deposit contributions within five business days of receipt.
- This C-3 report was inaccurate under the requirements of RCW 42.17A.240, as \$150 of the anonymous contributions were not deposited, but were instead given to you on August 27, 2019, but this report was filed in a good-faith attempt to disclose the contributions received by an officer of the Respondent, and used to make an expenditure on behalf of the Respondent.

Based on our findings staff has determined that, in this instance, failure to deposit anonymous contributions within five business days of receipt does not amount to a violation that warrants further investigation.

PDC staff is reminding the Clark County Republican Central Committee about the importance of timely depositing contributions into the designated depository within five business days of receipt. PDC staff expects that the Clark County Republican Central Committee will deposit contributions prior to using them to make expenditures in the future.

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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s

Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Clark County Republican Central Committee