

[Bruce](#) (Sun, 6 Oct 2019 at 5:49 PM)
to: "'PDC Support'" <pdcc@pdcc.wa.gov>
cc: chair@skagitgop.org

October 6, 2019

Public Disclosure Commission
C/o Tabitha Townsend
Compliance Coordinator

Re: Response to PDC Complaint Case Number 57702, Regarding Skagit County Republicans

Dear Tabitha Townsend,

On behalf of the Skagit County Republican Party please see attached (.PDF) Response to Complaint Case Number 57702. In addition, the Skagit County Republican Party's C3 and C4 filings are now current with all disclosures for 2019.

This has been a long and difficult process for the party and its officers. Many volunteer members helped with the needed reconstruction of 322 separate donors and 150 individual expenses. All donors are complete with addresses and, as required, occupations and employers with City, State and Zip Codes. Their PDC filings are now current and the Party vows to keep them current and in compliance with PDC disclosure requirements in the future.

The Skagit County Republican volunteers, officers and members have expressed deep regret and are sorry and embarrassed by this year's late filings. If you have questions or need more information please do not hesitate to contact me.

Bruce Ayers, Current Treasurer
On Behalf of Bill Bruch, Chair, Officers and Members
Of the Skagit County Republican Party

Sincerely,
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Skagit County Republican Party

October 6th, 2019

Public Disclosure Commission
C/o Tabitha Townsend
Compliance Coordinator

Re: Response to PDC Complaint Case Number 57702, Regarding Skagit County Republicans

Dear Tabitha Townsend,

My name is Bill Bruch, I am currently serving my 3rd year as volunteer Chairman of the Skagit County Republican Party. First and foremost, the leadership and members of the Skagit County Republican Party (SCRП) apologize and are deeply embarrassed and extremely frustrated that the required public disclosure documents were not filed in accordance the public disclosure requirements in 2019. As humble volunteers we all strive and work hard to ensure that all requirements are met. However proper PDC filing did not happen earlier this year and our sincere apology to the PDC.

This is what happened: Last November 2018 our longtime Treasurer Janet Dahl told me she planned on retiring at the end of the year and she had found an excellent replacement for herself as new Treasurer to continue duties for the Skagit County Republican Party, her name was Judy Dunn-Lee. At the time we all felt this was a great choice as Mrs. Dunn-Lee was a professional bookkeeper, was married to a CPA, and claimed to be proficient with the PCD and all the PDC filing requirements, ORCA, etc. Also, Judith represented herself to have a working knowledge of QuickBooks and reassured us that she would not have any problems as the new SCRП treasurer. Additionally, Judith was an elected member of the Sedro-Wooley City Council, giving us added confidence she was the perfect person for the job.

In December 2018 Janet Dahl completed all the required December PDC filings and retired as Treasurer at the end of the year; then in January 2019 Judith Dunn-Lee officially became the new SCRП Treasurer. We did everything in our power to assist Judith with a smooth transition as our new treasurer; to the point that the SCRП loaned out a dedicated desktop computer loaded with the active Orca software to Judith to take to her home/office in Sedro-Woolley with the purpose of making her treasurer work more convenient and efficient.

In January 2019 Judith was given an office key to the SCRП office in Mount Vernon and established a routine of coming to the SCRП's office every few weeks on College Way and picking up the pertinent donation and expense documents for posting in QuickBooks and for PDC timely filings. She repeatedly stated to both Janet Dahl and myself that she was current on her PDC postings and filings. Judith's established routine of picking up documents and responding to emails and other communications on a regular basis gave all our volunteer party officials and office support the impression that it was business as usual and all treasurer and PDC filing requirements were being performed by Mrs. Dunn-Lee.

Throughout early 2019 Janet asked Judith several times if she needed any assistance, and according to Janet, every time Judith assured her that she had no issues, and all was well. Also, on multiple occasions

between January 2019 and July of 2019 I asked Judith how things were going with her new duties, the PDC, etc. and she always indicated everything was good and being filed properly.

As the May 2019 Lincoln/Reagan Day Dinner approached the SCRCP volunteers were very busy with the planning of the event. Judith participated in these preparations and continued to report all was well with the bookkeeping and PDC filings. The Lincoln/Reagan Dinner was successful with over two hundred people in attendance. However, during the event there were problems. The plan was to use Square and have two laptop PC's to record the financial transactions during the event. However, the Square device did not work and only one computer was brought to the event. Recording financial transactions was slow because of long lines of people trying to purchase tickets, silent auction items, etc. After the event, Judith explained that she would take everything home and work on accounting for all the donations and expenses at her home. She said she would then report back to the L/R Day Dinner Committee over the next few weeks with accurate information; unfortunately that never happened.

Despite repeated conversations and emails over the next few months from me to Judith asking for the final reporting of the Lincoln/Reagan Dinner, it was never delivered by her. She did however continue to come into the office and collect documents and information. She continued to assure all who inquired that the Lincoln/Reagan Day records would be done soon, and all was good and she had submitted all required PDC reports. Her testimonials including monthly reports at the PCO membership meetings.

In June and July the SCRCP volunteers were very busy organizing our Shipwreck Days Street Festival Booth in Anacortes and the following weekend's SCRCP Salmon Barbeque Picnic (that turned out to have more than 130 attendees) in Burlington's Rotary Park. Judith worked side-by-side with other volunteers and continued to assure everyone that she was current with all PDC filings. Shortly thereafter in early August the party organized our weeklong Skagit County Fair booth in Mount Vernon. Judith again participated in working the Fair Booth and collecting needed documents for merchandise sales and making bank deposits. She was very convincing that all was good with the PDC and not to worry.

Immediately after the County Fair I called Bruce Ayers of Ayers Consulting LLC and asked how we could check with the PDC to confirm that the SCRCP filings had been accurately filed. During this telephone call Bruce explained that he could check the SCRCP filings online at the PDC and walked me through the websites prompts to the Skagit County Republican Party Committee listing. I was shocked and flabbergasted to discover that the PDC website showed no SCRCP reported activity and that no C3's or C4's had been filed for the Skagit County Republican Party Committee in 2019. At that moment, horrified I realized that our party had been misled this entire time by Judith Dunn-Lee.

It was clear that Judith had totally mis-represented her actions and had completely failed to perform any of her PDC duties as the Committees Treasurer. I immediately notified her via email she was no longer the SCRCP treasurer and she needed to bring the SCRCP's computer, office keys and all documents and records to the parties' offices as soon as possible. Judith agreed to attend a meeting at the SCRCP office with Janet Dahl and myself but did not bring the required computer or documents and only stayed for about 10 minutes. She then assured us she would bring the computer, office key and all documents to the office the next week, however the following week she was unresponsive and never again returned to the SCRCP office. After several more unanswered emails (her cell phone had been disconnected), it took two trips to Judith's Sedro-Woolley home to finally recover the SCRCP key, computer and other documents that she had in her possession. It was then discovered that Judith had not retained most of the required financial documents. She did not provide any QuickBooks bookkeeping records or other

documentations for Committee donations and expenses that was needing to be posted and filed with Orca software for the prior 8 months. We were all absolutely stunned at the recent discoveries.

Ayers Consulting LLC was immediately hired and retained to bring the committee's PDC filing current. Bruce Ayers then started compiling the needed donor deposits information and expenditures, addresses, occupations, employers and zip codes. Resources included bank records, Anedot credit card records, searching google and other data sources for telephone numbers, addresses and employer location and zip codes. Bank records were secured. Bruce also began the lengthy and time-consuming task of reconstructing all the Committee's financial documents from the beginning of 2019.

The donation checks recovered from the bank did not have all the required information (Occupation and Employer and Zip). Expenses did not have vender addresses and needed detail concerning the purchases. There were few existing records of the Lincoln/Reagan Dinner, live and silent auctions, dessert dash and raffles that raised donations at the dinner. Records for the dinner had to be reconstructed from other volunteers who help organize the events. This was painstaking and time consuming. Needed telephone numbers were searched on Skagit County voter list. Donor names and business were googled, and many embarrassing calls to individual donors had to be made to secure the required address, occupation, employer and address, etc.

As information was gathered it became clear that Judith had no idea what the PDC requirements were. In addition, had no idea how to file C3's or C4's. Upon further research it was discovered that Judith previously filed her City Council campaigns as a 'Mini Reporter' and had no experience or understanding of how to perform 'Full Reporting' filings. Judith had totally mis-represented herself.

Since Ayers Consulting was retained over the past several weeks Bruce Ayers has successfully, with the help of myself and several other volunteer members of the SCRPP, filed C3's and C4's for January, February, March and April. In addition, Bruce has completed the Lincoln-Reagan Dinner live and silent auction reports for May and filed May's with the PDC. The June, July and August C3's and C4's have been completed and filed. Bruce expects that he will complete the September filing this coming week and the SCRPP will be current and back in full compliance.

Please understand that I am so sorry this has happened, the Skagit County Republican Party is very saddened and embarrassed, as we put our faith and trust in one volunteer. We all have learned valuable lessons and promise that the SCRPP will stay in compliance with all PDC requirements. It is my understanding that there has been no history of any SCRPP PDC violations in the past, and the County Party has always been in full compliance. Nevertheless, we are taking extra measures and other appropriate steps to ensure that no non-compliance actions with the Public Disclosure Commission and the PDC's disclosure requirements will ever happen again. Thank you for your patience on this matter.

Respectfully,



Bill Bruch, Chairman

Skagit County Republican Party

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