

PDC complaint case number 57702 regarding Skagit County Republicans bonafide political party committee submitted via the PDC's online form on September 19, 2019

To Whom it May Concern:

I have reason to believe that the 2019 Skagit County Republicans bonafide political party committee may have committed multiple violations of RCW 42.17A.235 and/or RCW 42.17A.225 for failing to timely file required C-3 and C-4 reports with the PDC.

On August 24, 2019, I looked at the PDC website's online filing records for the 2019 Skagit County Republicans bonafide political party committee. On that date, and several times prior to that date, when I checked the Skagit County Republicans bonafide political party committee's online PDC filing records, there were no records showing that any contribution (C-3) or expenditure (C-4) reports had been filed.

On August 24, 2019, when I looked at the PDC website's online filing records for the 2019 Skagit County Republicans bonafide political party committee under the "Reports" tab, and on several occasions prior to that date when I checked their political party committee under the "Reports" tab, it showed "No reporting history available."

Also, on August 24, 2019 when I was on the PDC website and clicked on the "Overview" tab for the Skagit County Republicans bonafide political party committee, there was no information whatsoever provided in terms of the "campaign starting balance," or "contributions," or "expenditures" as are typically listed in the Overview.

I have attached Exhibit A to this PDC complaint which contains screenshot photos documenting points I have outlined in the complaint. Included in Exhibit A are screenshot photos I took on August 24, 2019, which showed there were no contribution or expenditure reports showing on that date as having been filed by the Skagit County Republicans political party committee, and a screenshot photo I took on August 24, 2019, which showed how their political party committee's "Overview" looked on that same date. Also included in Exhibit A are screenshot photos showing the list of "All reports filed by this campaign or committee" which shows the reporting "Period" dates and across from those, the "Filed" dates of each are shown.

So, for the August 6, 2019 primary election, voters had absolutely no information available to them about the campaign finance activities regarding the Skagit County Republicans bonafide political party committee.

When I looked on the PDC website on or around September 12, 2019, I saw that the Skagit County Republicans bonafide political party committee has now filed some C-3 contribution and C-4 expenditure reports.

According to the PDC website's online records, the first C-3 report was not filed by the Skagit County Republicans bonafide political party committee until 8/31/19. However, that first C-3 report shows a deposit date of 1/4/19 for contributions which were received on 1/4/19. I believe that the Skagit County Republicans bonafide political party committee's apparent failure to timely file its report of those contributions may be in violation of RCW 42.17A.235 and/or RCW 42.17A.225.

As of today's date, September 19, 2019, the PDC website shows that twenty-two C-3 reports have been filed/reported by the Skagit County Republicans bonafide political party committee. I believe that each one of those twenty-two C-3 reports appear to have been filed late, and therefore each apparent late report may constitute a violation of RCW 42.17A.235 and/or RCW 42.17A.225.

Also, as of today's date, September 19, 2019, according to the PDC website, the most recent C-3 report shows the most recent contribution as having been received by the Skagit County Republicans bonafide political party committee on 4/27/19.

That C-3 report shows a deposit date of 4/30/19, yet it is very likely that the Skagit County Republicans bonafide political party committee has received contributions since that deposit date of 4/30/19. There are no C-3 reports showing as having been filed by their committee showing any contributions were received after the date of 4/30/19. If there were, in fact, additional contributions received by the Skagit County Republicans bonafide political party committee since 4/30/19, it would appear then that those contributions have not been timely filed/reported as is required by RCW 42.17A.235 and/or RCW 42.17A.225.

According to the PDC website's online records, the first C-4 report was not filed by the Skagit County Republicans bonafide political party committee until 8/31/19. That C-4 report was for the date range 1/1/19 through 1/31/2019. According to the C-4 for the date range 1/1/19 through 1/31/2019, it does not appear to have been timely filed/reported by the Skagit County Republicans bonafide political party committee as is required by RCW 42.17A.235 and/or RCW 42.17A.225.

Also, there were three additional C-4 reports which appear to have been filed late by the Skagit County Republicans bonafide political party committee. Those C-4 reports were for the following date ranges:

2/1/19 - 2/28/19 filed on 8/31/19

3/1/19 - 3/31/19 filed on 8/31/19

4/1/19 - 4/30/19 filed on 9/9/19

I believe each one of those four C-4 apparent late filings referenced above may constitute a violation of RCW 42.17A.235 and/or RCW 42.17A.225.

It is very likely that the Skagit County Republicans bonafide political party committee has made expenditures since 4/30/19, yet there are no C-4 reports showing as having been filed by their committee since 8/31/19 for the months of May, June, July, and August. If there were additional expenditures made by the Skagit County Republicans bonafide political party committee since 4/30/19, it would appear then that those expenditures have not been timely filed/reported as is required by RCW 42.17A.235 and/or RCW 42.17A.225.

As demonstrated in this complaint, for the August 6, 2019 primary election, the public and voters appear to have had absolutely no information provided and available to them about the campaign finance activities related to the Skagit County Republicans bonafide political party committee.

Also, as demonstrated in this complaint, for the November 5, 2019 general election, the public and voters do not appear to have complete, up-to-date, and transparent information provided and available to them about the campaign finance activities related to the Skagit County Republicans bonafide political party committee subsequent to the last C-3 report filed by their committee which shows a deposit date of 4/30/19, and subsequent to the last C-4 report filed by their committee which was for the date range 4/1/19-4/30/19.

I believe that the information I have provided in this complaint is sufficient to warrant an investigation by your agency to determine if there, in fact, have been any violations of RCW 42.17A.235 and/or RCW 42.17A.225 by the Skagit County Republicans bonafide political party committee.

Thank you for your attention to this matter.

Regards,

Sandy Robson