



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)**

December 16, 2019

Sent electronically to Sandra Robson at [sjrer@icloud.com](mailto:sjrer@icloud.com)

Subject: Complaint regarding the Skagit County Republicans, PDC Case 57702

Dear Ms. Robson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 19, 2019. The complaint alleged that the Skagit County Republicans, a Continuing Bona fide County Political Party Committee, may have violated RCW 42.17A.235 by failing to timely file Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports) during the 2019 election cycle.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements for a political party committee; the applicable C-3 and C-4 reports; and the response to the allegation(s) by Bruce Ayers on behalf of the Skagit County Republicans (Committee).

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

- On August 14, 2019, the Committee filed a Committee Registration (C-1 report) as a Continuing Bona fide County Political Committee, selecting the "Full Reporting" Option, and listing Bill Bruch and Bruce Ayers as the Committee campaign manager and treasurer, respectively. The Committee has been registered with the PDC and reporting as a Bona fide County Political Committee dating back to 1996.
- The Committee failed to timely file C-3 and C-4 reports covering the period January 1 through August 31, 2019, including the 21-Day Pre-Primary Election C-4 report. The 21-Day Pre-Primary Election C-4 report was required to be filed by the Committee no later than July 16, 2019, covering the period June 1 through July 15, 2019.
- On September 29, 2019, the Committee filed the June 2019 C-4 report disclosing \$775 in contributions received and \$3,780 in expenditures made that included: (1) a \$500 contribution made on June 3, 2019 to Rich Wesen, a 2019 candidate for School Director in the Burlington-Edison School District; (2) a \$500 contribution made on June 26, 2019 to Sarah Nuanes, a 2019 Candidate for Mayor, City of Mount Vernon; and (3) a \$100 contribution made on June 26, 2019 to Duane Davidson, a 2020 Candidate for Re-Election to Washington State Treasurer.

- The three contributions were disclosed 75 days late by the Committee, and 54 days after the August 6, 2019 primary election was held.
- On October 2, 2019, the Committee filed the July 2019 C-4 report disclosing \$7,166 in contributions received and \$5,843 in expenditures made that included a \$500 monetary contribution made on July 2, 2019 to Joe DeGloria, a 2019 Candidate for Mayor, City of Burlington. The Contribution was disclosed 78 days late by the Committee, and 51 days after the August 6, 2019 primary election was held.
- On December 10, 2019, the PDC received an executed Statement of Understanding (SOU) signed by the Committee's chairperson, Bill Bruch, along with a \$150 civil penalty payment. By signing the SOU the Committee acknowledged violating RCW 42.17A.235 by failing to timely file the 21-Day Pre-Primary Election C-4 report, and paid a \$150 civil penalty to resolve this matter.

Staff's review of the facts found that the Committee has: (1) no prior PDC violations, and worked diligently to file the missing reports and come into compliance; (2) acknowledged violations of RCW 42.17A.235 and paid a monetary civil penalty; and (3) fully cooperated with PDC staff.

PDC staff determined in this instance, the additional late filed C-3 and C-4 reports for 2019 do not warrant further investigation. PDC staff has reminded the Committee to timely and accurately file C-3 and C-4 reports disclosing contribution and expenditure activities undertaken in the future as required for a Bona fide Political Party Committee in accordance with PDC statutes, rules, and reporting requirements.

The PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Bill Bruch, Committee Chair

