



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 • Website: www.pdcc.wa.gov

May 13, 2020

Sent electronically to Chandler Bailey at chpabailey@gmail.com

Subject: Complaint regarding Mead Citizens Advisory Committee, PDC Case 58100

Dear Mr. Bailey:

The Public Disclosure Commission (PDC) has completed its investigation of your complaint received on October 2, 2019. Your complaint alleged that the Mead Citizens Advisory Committee (Committee) committed violations of RCW 42.17A in the 2019 election year.

Specifically, your complaint alleged that the Committee may have:

1. Failed to timely file a Committee Registration report (RCW 42.17A.205(1)(2)(d)).
2. Failed to file timely Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) – RCW 42.17A.235. You provided/attached copies of mailers and pictures of one of the four signs posted by the Committee along the Newport Highway (Hwy 2) on September 30, 2019, to substantiate the alleged violations.

RCW 42.17A.205 (1)(2)(d) requires political committees to file a committee registration with the Commission within two weeks of organization or within two weeks of a committee/organization's expectation of receiving contributions or making expenditures in any election campaign. Committees are required include the name, address, and electronic contact information of its treasurer and depository, including the names, addresses, and titles of its officer; or if it has no officers, the names, addresses, and titles of its responsible leaders.

RCW 42.17A.235 requires single election political committees and continuing political committees to file timely reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report. C-4 reports are also required 21 and 7 days before each election in which the committee makes expenditures, and in the month following the election. Contributions are reported weekly during this same time period and must be disclosed on Monday for contributions deposited during the previous seven days.

PDC staff reviewed your complaint, the response from Committee, by way of Renae Wendle, and the appropriate reports filed by the respondent with the PDC.

As a result of the investigation, staff found the following:

Alleged failure to timely file a committee registration (RCW 42.17A.205). The complaint included copies of mailers and pictures of one of the four signs posted by the Committee along the Newport Highway (Hwy 2) on September 30, 2019 as evidence of possible violation.

- The Committee received its first monetary contribution on September 30, 2019, in the amount of \$1,623.79. The Committee therefore had the expectation to receive contributions shortly before that or thereafter and thus should have registered with the PDC no later than two weeks after receiving the first contribution. The Committee failed to file the committee registration report within two weeks as required by law.

Alleged failure to file timely C-3 and C-4 reports (RCW 42.17A.235). The complaint included copies of mailers and pictures of one of the four signs posted by the Committee along the Newport Highway (Hwy 2) on September 30, 2019 as evidence of possible violation.

- On November 24, 2019, the Committee filed a C-3 report disclosing \$1,623.79 in monetary contributions, including two contributions received on September 30, 2019 totaling \$615.29, and multiple small contributions totaling \$1,008.50. The report was filed 48 days late, and 19 days after the November 5, 2019 general election.
- On March 17, 2020, the Committee filed a C-3 report disclosing \$1,418.56 in monetary contributions received, including 17 contributions on October 31, 2019 for \$663.06, and multiple small contributions totaling \$755.50. The \$1,418.56 in contributions was reported 134 days late, and 133 days after the November 5, 2019 general election.
- On March 18, 2020, the Committee filed a C-3 report disclosing \$1,242.69 in monetary contributions received, including 46 contributions on November 30, 2019 for \$744.69, and multiple small contributions totaling \$498. The \$1,242.69 in contributions was reported 107 days late, and 134 days after the November 5, 2019 general election.
- On March 29, 2020, the Committee filed a C-3 report disclosing \$1,058.50 in monetary contributions received, including 46 contributions on December 31, 2019 for \$567.50, and multiple small contributions totaling \$491. The \$1,058.50 in contributions was reported 83 days late, and 145 days after the November 5, 2019 general election.
- On November 9, 2019, the Committee filed the 21-Day Pre-General Election C-4 report, covering the period beginning September 1 through October 14, 2019. This report was due no later than October 15, 2019, and was filed 25 days late and four days after the November 5, 2019 general election. The report disclosed \$2,125 in expenditure for campaign signs on September 12, 2019, and \$1,623 in contributions received.
- On February 24, 2020, the Committee filed the 7-Day Pre-General Election C-4 report, covering the period beginning October 15 through October 28, 2019. This report was due no later than October 29, 2019, and was filed 118 days late and 111 days after the November 5, 2019 general election. The report disclosed \$10,697 in expenditures for billboard and theater advertising, mailing services and printing related expenses between October 16, 2019 and October 23, 2019.
- On February 24, 2020, the Committee filed the End of Election Cycle C-4 report, covering the period beginning December 1, 2019 through December 31, 2019. This report was due no later than January 10, 2020, and was filed 45 days late. The report disclosed \$12,155 in expenditure for campaign related project consulting expenses on December 12, 2019.

After a careful review of the alleged violations and relevant facts, PDC staff has concluded its investigation.

Pursuant to WAC 390-37-060(1)(f), the Mead Citizens Advisory Committee, by way of its treasurer Renae Wendle, completed a Statement of Understanding (SOU) and paid a \$1,000.00 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging the following violations: (1) the failure to file a committee registration within two weeks of organization or within two weeks of a committee/organization's expectation of receiving contributions or making expenditures in any election campaign (RCW 42.17A.205(1)(2)(d)); and (2) the failure to timely file statutorily required C-3 and C-4 reports (RCW 42.17A.235). The \$1,000.00 assessed penalty resolves this complaint.

If you have questions, you may contact Erick Agina, Compliance Officer, at (360) 753-1111, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s/ Peter Lavallee

Peter Lavallee
Executive Director

cc: Mead Citizens Advisory Committee

