



**STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION**

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August 6, 2020

Sent electronically to Lisa Neal at lisaandchrisneal@comcast.net

Subject: Complaint regarding Sarah Blossom, PDC Case 72310

Dear Ms. Neal:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 16, 2020. Your complaint alleged that Sarah Blossom, an incumbent councilmember for the City of Bainbridge Island, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures, and RCW 42.17A.555 for using public facilities to assist an election campaign in the 2019 election year.

The PDC staff reviewed the allegations listed in the complaint to determine whether a formal investigation or enforcement action is warranted. Staff reviewed all attachments submitted with the complaint, the statute, rules, and PDC Interpretation 04-02 "Guidelines for Local Government Agencies in Election Campaigns," and the July 6, 2020, response from Sarah Blossom.

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

- On May 2, 2019, Sarah Blossom filed a Candidate Registration (C-1 report) declaring her candidacy for City Councilmember (Position 6) for the City of Bainbridge Island in 2019, selecting the Full Reporting Option.
- On June 25, 2020, Sarah Blossom filed an amended Candidate Registration (C-1 report) and changed from the Full Reporting Option to Mini Reporting Option.

Alleged failure to file timely and accurate C-3 and C-4 reports in the 2019 election year (RCW 42.17A.235 and .240).

- RCW 42.17A.235 and .240 require candidates to file timely and accurate 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 candidate's committee makes expenditures, and in the month following the election. Contributions are reported weekly during this same period, and must be disclosed each Monday for contributions deposited during the previous seven days, unless a candidate qualifies for the mini reporting option.

- Based on the Candidate's Registration report filed on May 2, 2019, and amended on June 25, 2020, after the complaint was received, any contribution(s) received prior to the Candidate Registration being amended should have been reported on a C-3 report. For example, the \$250 contribution received by the Blossom Campaign should have been reported on a C-3 report.
- In her response to the complaint, Ms. Blossom stated... "My campaign qualified for mini-reporting and I made the change online through the Secure Access Washington website. I did not solicit campaign contributions but did receive one contribution from a married couple in the amount of \$250. I also deposited, as a loan, \$500 of my own funds to my campaign account. I paid for my filing fee and purchased a photo of myself, which were in-kind contributions from myself to my campaign. In addition, I had one ad that cost \$289.20. The first check I wrote from my campaign account at the beginning of March did not clear the account. I subsequently received another bill and, since the first check would be considered stale, I mailed another check from my campaign account."

Alleged use of public facilities (city photograph and COBI-Connects newsletter) to assist an election campaign in the 2019 election year.

- RCW 47.17A.555 prohibits, in pertinent part, elective officials from using any facilities of a public office or agency, for the purpose of assisting a campaign for election.
- In her response to the complaint, Sarah Blossom stated, "My City photograph was not staged for my campaign, it was taken as part of the normal and regular practice of the city government and was available to the public to be downloaded from the City's website. However, I did not download it from the City's website. I purchased a copy directly from the photographer, Brenda Franklin of Genuine Image Photography, for \$261.60 and had her change the background and provide me with two different croppings. COBI Connects is a monthly newsletter that the City of Bainbridge Island mails out to its residents. The very first newsletter was published in April 2019. Each newsletter in 2019, except for May, featured a "Council Message" that was written by a Councilmember. Councilmembers were assigned their month by City staff. I was assigned November and was the last Councilmember to write a Council Message."
- Staff found that the November 2019 "Council Message" featuring Sarah Blossom in the COBI Connects newsletter was a normal and regular conduct/practice of the City of Bainbridge and is therefore not considered use of public facilities by Sarah Blossom. Additionally, Ms. Blossom did not use the City of Bainbridge photograph which was readily available for the public to download – instead, she bought a copy of the photograph directly from the photographer who originally took the picture for the City.

While Ms. Blossom should have reported the contributions she received from a married couple in the amount of \$250, since she did not formally file an amended C-1 report until June, 25, 2020, this shortcoming is mitigated by the fact that she qualified for mini reporting. Additionally, she has no prior PDC violations.

PDC staff will remind Ms. Blossom about the importance of timely amending the Candidate Registration (C-1) report in the future, so that the public has access to the most current C-1 report on file with the PDC.

Based on these findings, PDC staff 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 Erick Agina at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov

Sincerely,

Endorsed by:

/s _____
Erick Agina, Compliance Officer

/s _____
Peter Lavalley, Executive Director

cc: Sarah Blossom

