



**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

December 3, 2020

Delivered electronically to Matthew Larkin at “info@mattlarkinforag.com”

Subject: Complaint filed by Dennis Paul, PDC Case 76914

Dear Mr. Larkin:

Below is a copy of an electronic letter sent to Dennis Paul concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Dennis Paul, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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December 3, 2020

Delivered electronically to Dennis Paul at “returns@publicfilingservice.com”

Subject: Complaint regarding Matthew Larkin, PDC Case 76914

Dear Dennis Paul:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 11, 2020 and the additional information provided on September 14, 2020. The complaint alleged that Matthew Larkin, a candidate for Washington State Attorney General in the 2020 primary and general election, may have violated RCW 42.17A.235 and 42.17A.240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by Mr. Larkin (the “Respondent”); the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- On December 9, 2019, Matthew Larkin filed a Candidate Registration (C-1 report) declaring his candidacy for Washington State Attorney General in the 2020 election, choosing the “Full Reporting” option, and listing Jason Michaud as ministerial treasurer.
- The complaint alleged that the 2020 Larkin Campaign failed to report in-kind contributions received from the candidate’s business ROMAC Industries, Inc. for the use of office space, that the campaign misreported the source of an in-kind donation sold in an online campaign auction event, and used inaccurate reporting dates when disclosing the online auction event.
- In his response, Mr. Larkin stated that the use of the ROMAC Industries, Inc. office location was as a part-time meeting space, the offices were vacant and not used as the official campaign headquarters. Further, the campaign had no employees and the vendors and campaign manager worked from home. On October 8, 2020, a \$280 payment was made to ROMAC to cover costs connected to the campaign’s sign storage, limited internet use, and other miscellaneous office space use. Mr. Larkin stated that this payment was not disclosed earlier as a debt because it did not meet the reporting threshold.
- Regarding the source of an auction item reported as being donated by Bruce Talcott, Mr. Larkin’s response stated that the campaign disclosed the donor of the item as it was provided to them at the time of receipt.

- Finally, Mr. Larkin stated that due to the restrictions on in-person events, the auction was held online and reported according to a method discussed with PDC staff. Specifically, when the auction items were originally won by bid, they were reported as pledges pending the future receipt of the credit card purchases. When the campaign received the actual payment, they disclosed this information and updated their reports which resulted in the editing of reporting dates.
- RCW 42.17A.405 identifies the list of elected offices that have limitations on both in-kind and monetary contributions received in the aggregate from one source. As a candidate for statewide office, Matthew Larkin's 2020 campaign was eligible to receive up to \$2,000 per election from each individual person who donated to his campaign.
- The complaint speculated that the reduction in the fair market value of auction items donated by Gigi and Ron Talcott and the use of Bruce Talcott, presumed a relative, as the source of a second auction item, was done to conceal the true donor's identity and inappropriately decrease the donor's total contribution.
- The campaign reports submitted by the 2020 Larkin Campaign disclosed two donations of auction items from Gigi and Ron Talcott totaling \$3,500 or \$1,750 each, a separate cash donation of \$100 attributed to Gigi Talcott increasing her contribution total to \$1,850, and finally one auction item donation from Bruce Talcott of \$700.

Staff did not find evidence showing that the campaign received over limit contributions or purposely concealed the source of a donation. Staff found that the reduction of the fair market value of items specifically affected by the current COVID restrictions was appropriate in this instance.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants further investigation.

Based on this information, the PDC 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 Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically signed

Jennifer Hansen
Compliance Officer

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cc: Matthew Larkin