



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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October 26, 2020

Delivered electronically to Norman Smith at [normsmith307@gmail.com](mailto:normsmith307@gmail.com)

Subject: Complaint regarding Paul Mahre, PDC Case 77318

Dear Mr. Smith:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 12, 2020. Your complaint alleged that Paul Mahre, a 2020 candidate for County Commissioner (District 3) in Pend Oreille County, may have violated RCW 42.17A.240 for failure to properly break down and describe expenditure details, as required in WAC 390-16-037 and WAC 390-16-205.

PDC staff reviewed your allegation; the applicable statute, rules, and reporting requirements; and the 21-Day Pre-Primary, 7-Day Pre-Primary, and the Post-Primary 2020 Summary Campaign Contribution and Expenditure reports (C-4 reports) filed by the Paul F. Mahre for Pend Oreille County Commissioner Committee (Campaign); and the September 30, 2020 response to the complaint provided by Paul Mahre on behalf of the Campaign.

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

- On May 19, 2020, Paul Mahre timely filed a Candidate Registration (C-1) report and selected the Full Reporting Option after permission was granted for Mini-to-Full reporting.

***Alleged failure to properly break down and describe expenditure details – (RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205)***

- Staff reviewed the description of the payments/expenditures made by the Campaign on the 21-Day Pre-Primary, the 7-Day Pre-Primary and the Post-Primary 2020 C-4 reports, and found that the expenses lacked proper description(s) and break down required by law/rule. For example, the Campaign did not break down the number of Tri-fold mailers paid to *Walt's Mailing Services* in the amount of \$550 on July 29, 2020. The same applies to the Tri-fold mailer on July 15, 2020 for \$1,001.77 and the Postcard mailer for \$751.76 on July 1, 2020. The Campaign failed to include the number of mailers for both purchases. A more detailed description that includes the number of items bought should have been included in the three C-4 reports depicted supra.
- On September 30, 2020, the Campaign amended the pertinent C-4 reports and included detailed description of expenditures made and the number of items bought. In its response to this complaint, the Campaign by way of Paul Mahre, stated, "I have submitted amended C4 reports for the periods of: 06/01/2020 –

07/13/2020, 07/14/2020-07/27/2020, 07/28/2020-08/31/2020. The amended reports have the number of pieces printed for each of the mailers done by Walt's Mailing Service.”

Based on these findings staff has determined that, in this instance, the Campaign's failure to properly and accurately describe the purpose of the expenditures to include the number/quantity of the mailers printed, does not amount to a violation warranting further investigation.

There were a few expenditures made by the Campaign either to a vendor or as an in-kind from Mr. Mahre in the month of July 2020, for which a more detailed explanation or description such as the number/quantity of items printed should have been provided for each of the three mailers. However, this shortcoming is mitigated by the fact that the Campaign was responsive and amended the pertinent reports as soon as the deficiencies were brought to their attention.

However, Paul Mahre will receive a reminder letter concerning his 2020 Campaign's failure to properly break down or describe monetary campaign expenditures, as required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205.

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 Erick Agina, Compliance Officer at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov)

Sincerely,

Endorsed by,

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

s/ \_\_\_\_\_  
Barbara Sandahl, Deputy Director for  
Peter Lavalley, Executive Director

cc: Paul Mahre

