



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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January 22, 2021

Delivered electronically to Alex Bond at alexjbond@gmail.com

Subject: Complaint regarding Carolyn Eslick, PDC Case 79635

Dear Mr. Bond:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 30, 2020. Your complaint alleged that Carolyn Eslick, a 2020 candidate for the State House of Representative in the 39th Legislative District, may have violated RCW 42.17A.205, .235 and .240 for failure to timely register and report activities for a Surplus Funds Account.

PDC staff reviewed your allegations; the applicable statute, rules, and reporting requirements; the 2020 Cash Receipts Monetary Contributions (C-3) and Summary, Full Report Receipts and Expenditures (C-4) reports filed by the Carolyn Eslick Campaign (Committee); and the December 15, 2020 response to the complaint provided by Carolyn Eslick, on behalf of the Committee.

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

- On December 3, 2020, Carolyn Eslick filed a Candidate Registration (C-1) report for her 2020 Surplus Account and selected the Full Reporting Option.

Alleged failure to timely register and report activities for a Surplus Funds Account (RCW 42.17A.230, .235, .240 and WAC 390-16-236).

- On December 3, 2020, the Committee filed a C-4 report depicting a \$15,000 deposit/transfer into the surplus funds account (Carolyn Eslick Campaign Surplus Account) for the report covering the period beginning August 1 through August 31, 2020. The transfer/deposit to the surplus funds account was made on August 31, 2020. Staff noted that this report was due no later than September 10, 2020 and was reported 84 days late.
- On the same day, December 3, 2020, the Committee also filed a Candidate Registration (C-1) for the Carolyn Eslick Campaign Surplus Account. This report was due no later than two weeks after the first deposit or transfer was made on August 31, 2020 and was filed 80 days late.

- WAC 390-16-236(1) requires that the C-1 report be filed with the Commission within two weeks of a surplus funds account being opened by a candidate. Specifically, it states: “Any person who opens an account into which a surplus funds will be deposited shall register the account by filing PDC Form C-1, Candidate Registration with the Commission.”
- In its response to the allegation(s) received on December 15, 2020, the Committee, by way of Carolyn Eslick stated: “The amount of \$15,000 was donated on August 4, 2020. My C4 dated 9-2 (attached) shows this contribution disclosed on this report. This is more than 21 days from the November 3, 2020 election. I have no control over when HROC filed their receipt of funds. The money was sent from the Carolyn Eslick Campaign Surplus Fund. I was not aware that I needed to set this account up with a new C-1. My Campaign PDC records do show this recorded as a Surplus Funds contribution to HROC. There was no effort made to hide or deceive where the money was going, nor for what purpose.”

Pursuant to WAC 390-37-060(1)(d), Carolyn Eslick will receive a formal written warning concerning the failure to timely register and report activities for a Surplus Funds Account. Carolyn Eslick will be informed the Commission will consider the formal warning in deciding on further Commission action if there are future violations of the PDC laws or rules.

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

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
Peter Lavalley, Executive Director

cc: Carolyn Eslick

