

Respondent Name

Carolyn Eslick

Complainant Name

Alex Bond

Complaint Description

[Alex Bond](#) (Fri, 30 Oct 2020 at 2:18 PM)

The House Republican Organizational Committee (henceforth HROC) filed C3 report #101012825 on 10-29-2020 indicating that they accepted a \$15,000 contribution from the "Carolyn Eslick Campaign" on 10-28-2020 <https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=101012825> There appear to be three problems that make this contribution illegal.

RCW 42.17A.420 states that:

- (1) It is a violation of this chapter for any person to make, or for any candidate or political committee to accept from any one person, contributions reportable under RCW [42.17A.240](#) in the aggregate exceeding fifty thousand dollars for any campaign for statewide office or exceeding five thousand dollars for any other campaign subject to the provisions of this chapter within twenty-one days of a general election. This subsection does not apply to:
- (a) Contributions made by, or accepted from, a bona fide political party as defined in this chapter, excluding the county central committee or legislative district committee;
 - (b) Contributions made to, or received by, a ballot proposition committee; or
 - (c) Payments received by an incidental committee.

The contribution being received on 10-28-2020 is obviously within 21 days of the November 3rd general election. As PDC guidance makes additionally clear beyond the RCW <https://www.pdc.wa.gov/learn/news/what-keep-mind-waning-days-2020-election> registered political committees like HROC cannot accept more than \$5,000 from a single source. This appears to be an illegal contribution.

RCW 42.17A.265 states that:

- (1) Treasurers shall prepare and deliver to the commission a special report when a contribution or aggregate of contributions totals one thousand dollars or more, is from a single person or entity, and is received during a special reporting period.

...

- (4) Special reporting periods, for purposes of this section, include:
- (b) The period twenty-one days preceding a general election; and

A review of Last Minute Contribution (LMC) forms filed with the PDC does not show an LMC form from HROC reporting this contribution. So they failed to legally report it as well.

Third, it's important to note that this does NOT appear to be a transfer of surplus funds from an Eslick surplus account to HROC. This appears to be a contribution directly from her active

campaign committee. The HROC C3 reports the donor as being "Carolyn Eslick Campaign" which is the name of her active campaign committee according to its registration: https://apollo.pdc.wa.gov/public/registrations/registration?registration_id=17299 They report the address as being from PO Box 776 Sultan WA 98294, which HROC's own website says is the mailing address of Eslick's active campaign: <https://hroc.us/members/carolyn-eslick/> And reviewing a list of surplus accounts, Eslick doesn't appear to have a surplus fund at all: <https://www.pdc.wa.gov/browse/more-ways-to-follow-the-money/candidates/surplus?category=Candidates>

RCW 42.17A.430 says that:

(8) No candidate or authorized committee may transfer funds to any other candidate or other political committee.

The disposal of surplus funds under this section shall not be considered a contribution for purposes of this chapter.

For this reason, the contribution is yet again illegal. Eslick's active campaign committee can't send money directly to HROC, something expressed very clearly on the PDC contribution limits chart: <https://www.pdc.wa.gov/learn/contribution-limits>

Eslick would need to set up a surplus fund, send general election money to that fund after election day, then that fund can send money to HROC. HROC and Eslick have skipped those steps and are doing an illegal contribution instead. These are pretty simple rules and HROC should really know better than this, and they should be sanctioned.

Looking at HROC's PDC, I can speculate as to why they're doing this. They are almost broke and they are going to have a hard time paying end of October bills. According to the most recent records as of now (10/30) it looks like they have about \$18,218 cash on hand, almost all of which is from this \$15,000 contribution. \$3,218 is a pretty grim cash on hand situation to be in when you have monthly bills due. They probably know this is an illegal contribution and that they'll eventually have to return the money to Eslick once this complaint hits, but they'd also know that that will take a while and by the time that happens, it'll be after election day and they'll be able to legally accept general election surplus from other members to balance their budget and afford the refund. So I really think it's important that the PDC act here and not just accept "sorry, we refunded the money" as an excuse. I hope this is taken seriously by the PDC.

What impact does the alleged violation(s) have on the public?

List of attached evidence or contact information where evidence may be found

HROC C3 101012825
<https://web.pdc.wa.gov/rptimg/default.aspx?batchnumber=101012825>

List of potential witnesses with contact information to reach them

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.