



**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](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)**

November 16, 2020

Sent electronically to [skagitrepublicans@yahoo.com](mailto:skagitrepublicans@yahoo.com) and [bruce@bruceayers.com](mailto:bruce@bruceayers.com)

Subject: Complaint filed by Alex Bond, PDC Case 78963

Dear Skagit County Republicans:

Enclosed is a copy of an electronic letter sent to Alex Bond concerning a complaint filed October 22, 2020 with the Public Disclosure Commission (PDC) alleging a violation of RCW 42.17A.405, making an over-limit contribution. The complaint alleged contributions to a legislative candidate, when combined with contributions from another county central committee and legislative district committee, exceeded contribution limits for a 2020 legislative candidate allowed in RCW 42.17A.405(4)(b).

As noted in the letter below, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding the Skagit County Republicans about the importance of compliance with RCW 42.17A.405 and PDC staff expects the Skagit County Republicans will not contribute in excess of contribution limits in the future, as required by law.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

\_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,

/s

\_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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November 16, 2020

Sent electronically to alexjbond@gmail.com

Subject: Complaint regarding Skagit County Republicans, PDC Case 79693

Dear Alex Bond:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed October 22, 2020.

Your complaint alleged the Skagit County Republicans, a Continuing Bona-fide County Political Party Committee, violated RCW 42.17A.405 by contributing to Bill Bruch, who was a 2020 candidate for the Washington State House of Representative from the 10<sup>th</sup> District. The complaint alleged the contribution, when combined with contributions from other county central committees and a legislative district committee, exceeded contribution limits for a 2020 legislative candidate allowed in RCW 42.17A.405(4)(b).

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, and the response from Bruce Ayers, treasurer, Skagit County Republicans to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On August 14, 2019, the Skagit County Republicans (Committee) filed with the Public Disclosure Commission as a Continuing Bona-fide County Political Committee, selecting the "Full Reporting" Option, and listing Bill Bruch and Bruce Ayers as the Committee campaign manager and treasurer, respectively. The Committee has been registered with the PDC and reporting as a Bona fide County Political Committee dating back to 1996.
- Bill Bruch was a 2020 candidate for the Washington State House of Representatives from the 10<sup>th</sup> District.
- RCW 42.17A.405 limits Legislative candidates to receiving \$0.50 per registered voter per cycle. The 10th Legislative District included 103,150 registered voters in the most recent General Election, allowing for a total combined county/legislative district committee contribution limit of \$51,575.
  - RCW 42.17A.405 uses the terms "per election" for non-party contributions and "election cycle" for party contributions. Election cycle is defined by RCW 42.17A.005(20) as "the period beginning on the first day of January after the date of the last previous general election for the office that the candidate seeks and ending on December 31 after the next election for the office. In the case of a special election to fill a vacancy in an office, "election cycle" means the period

beginning on the day the vacancy occurs and ending on December 31st after the special election."

- Friends of Bill Bruch (Campaign) accepted donations from three county central committees during the 2020 election cycle, totaling \$55,365.50:
  - \$50,365.50 from the Skagit County Republicans
  - \$3,000 from the Island County Republican Party, and
  - \$2,000 from the Snohomish County Republican Party
- Ayers stated "When we (Friends of Bill Bruch) accepted a \$5000 contribution from the Skagit County GOP on 10/14/2020 we were unaware that this last contribution, of many, since the start of our campaign, had exceeded the shared statute limit for contribution from four County Party and Leg District committees in Leg District 10 of \$0.50 per Leg District voter. There had been numerous contributions from the four different organization throughout the campaign dating back to October 30, 2019, almost a year ago. I amended the applicable C4's and C3's for both the Friends of Bill Bruch Campaign and the Skagit County GOP in accordance with Compliance Officer, Alice Fiman's direction. The same day on October 26, 2020 I refunded the over-limit amount, using check #193 for \$4,190.00 and deposited the refund check in the Skagit County GOP's bank account."
- The Skagit County Republican's 7-Day Pre-general Election Summary Full Campaign Contribution and Expenditure (C-4) report was filed timely, October 27, 2020, listing only a \$809.50 contribution to Friends of Bill Bruch.

Based on these findings, staff has determined in this instance, exceeding the contribution limits for a 2020 legislative candidate allowed in RCW 42.17A.405(4)(b) does not amount a violation warranting further investigation.

PDC staff is reminding the Skagit County Republicans about the importance of compliance with RCW 42.17A.405 and PDC staff expects the Skagit County Republicans will not contribute in excess of contribution limits in the future, as required by law.

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, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s

\_\_\_\_\_  
Alice Fiman  
Compliance Officer

Endorsed by,

/s

\_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director