



**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.pdca.wa.gov

November 16, 2020

Sent electronically to bruch4house@gmail.com and bruce@bruceayers.com

Subject: Complaint filed by Alex Bond, PDC Case 79694

Dear Bill Bruch:

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 by accepting contributions from a county central committee that, when combined with 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).

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 you about the importance of compliance with RCW 42.17A.405 and expects your Campaign will not accept any contributions that exceed 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.

Sincerely,

Endorsed by,

/s

Alice Fiman
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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November 16, 2020

Sent electronically to alexjbond@gmail.com

Subject: Complaint regarding Bill Bruch, PDC Case 79694

Dear Alex Bond:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed October 22, 2020. Your complaint alleged Bill Bruch violated RCW 42.17A.405 by accepting contributions from a county central committee that, when combined with 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 for Friend of Bill Bruch (Campaign), to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- Bill Bruch was a 2020 candidate for the Washington State House of Representatives from the 10th District, registering with the PDC on October 28th, 2019. This was Bruch's first campaign for State Legislature.
- RCW 42.17A.405 limits Legislative candidates to receiving a maximum of \$0.50 per registered voter per cycle combined from county/legislative district committees. 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 GOP

- \$3,000 from Island County Republican Party, and
 - \$2,000 from Snohomish County Republican Party
- Ayers stated “When we 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. It was not our intent to accept an over-limit contribution. On October 22, 2020 just eight days after accepting the SCRP contribution, and prior to receiving any notice or complaint, it was brought to our attention that we may have exceeded the \$0.50 per voter limit shared limit by all four County and Leg District Committees in Leg District 10. I immediately totaled all of the multiple contributions received over the previous year. I discovered, that total contribution did appear to be over the shared \$0.50 per voter limit of \$51,575.00 by \$4,190.00. The following business day (Monday) and again prior to receiving any complaint, on October 26, 2020, 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. I will add that, at no time between the 10/14/20 banked subject contribution and the subsequent 10/27/20 when the refunded \$4,190.50 deposit cleared the Bruch account, did Friends of Bill Bruch’s bank balance drop below \$36,234.00 therefore none of the over-limit funds were ever used by the campaign.”
 - As noted above, the Campaign filed an amended Monetary Contribution (C-3) report October 25, 2020, amending a C-3 report filed October 15, 2020. The original report listed a \$5,000 contribution from the Skagit County GOP made October 15, 2020 while the amended report included a \$809.50 contribution from the Skagit County GOP made October 15, 2020.

Based on these findings, and the fact Bruch refunded the contribution promptly when notified of the requirement and the funds were not used by the Campaign, staff has determined in this instance the Campaign’s acceptance of over-limit contribution does not amount a violation warranting further investigation. PDC staff is reminding Bill Bruch about the importance of compliance with RCW 42.17A.405 and expects Bruch will not accept any contributions exceeding 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 pdcc@pdcc.wa.gov.

Sincerely,

/s
Alice Fiman
Compliance Officer

Endorsed by,

/s
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director