



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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December 29, 2021

Delivered electronically to 23<sup>rd</sup> Legislative District Republican Committee at  
“1963dbl@gmail.com” and “april@wa23rdrepublicans.com”

Subject: Complaints Filed by Elaina Gonzales-Blanton, PDC Case 80600

Dear Chair Ferguson:

After a careful review of the alleged violations and relevant facts, the PDC has resolved the complaints filed by Elaina Gonzales-Blanton against 23<sup>rd</sup> Legislative District Republican Committee. The complaints have been resolved through a Statement of Understanding and dismissal, as described below.

23<sup>rd</sup> Legislative District Republican Committee (Committee) completed a Statement of Understanding (SOU) in accordance with WAC 390-37-142. In the SOU, the Committee: (1) acknowledged a violation of RCW 42.17A.235 and .240 by failing to file timely and accurate campaign reports (C-3 and C-4 reports); (2) acknowledged a violation of RCW 42.17A.220 by failing to deposit monetary contributions within five business days of receipt; (3) acknowledged a violation of RCW 42.17A.235 & WAC 390-16-043 by failing to maintain current “books of account” for the purpose of providing them during the public inspection period prior to the November 3, 2020 general election; (4) expressed an understanding that the Commission will not hold an adjudicative hearing in connection with the violations; and (3) paid a \$750 civil penalty.

The \$750 penalty resolves these allegations. Staff believes this is the appropriate resolution considering all the facts and circumstances, including that the Committee has implemented several measures to ensure future compliance with PDC laws and rules, including training for Committee officers, independent audits, general accounting oversight procedures and the employment of an individual knowledgeable with PDC laws, rules and filing requirements, to fill the treasury position full-time.

The complaints also alleged that April Ferguson, Chair of 23<sup>rd</sup> Legislative District Republican Committee, violated RCW 42.17A.445 by misusing the funds received by or otherwise belonging to the Committee for her own personal financial gain.

Staff’s investigation found no evidence that Chair Ferguson misused Committee funds to benefit her personally. Therefore, I am dismissing that portion of the complaint in accordance with RCW 42.17A.755(1) and WAC 390-37-070.

23<sup>rd</sup> Legislative District Republican Committee  
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If you have questions, you may contact Jennifer Hansen, Compliance Officer, at 360-753-1111; toll-free at 877-601-2828; or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

*Electronically Signed Kim Bradford*

Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director