



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

January 19, 2021

Delivered electronically to xslm1231@gmail.com

Subject: PDC Case 82111, Complaint filed by Willie Russell

Dear 21st Legislative Democrats:

Below is a copy of an electronic letter sent to Willie Russell concerning a complaint filed December 11, 2020 with the Public Disclosure Commission (PDC).

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

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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January 19, 2021

Delivered electronically to 21ldpco@gmail.com

Subject: Complaint regarding 21st Legislative District Democrats, PDC Case 82111

Dear Willie Russell:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed December 11, 2020. The complaint alleged the 21st District Democrats violated RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately disclose contributions, in-kind, expenditures, debts, and loans, specifically failing to report a March 2019 donation of \$100 from the 21st Legislative District Cascade Precinct and the use of a personal Zoom account during 2020.

PDC staff reviewed the allegations, evidence you provided, applicable statutes and rules and the response provided by the 21st Legislative District Democratic Central Committee to determine whether the record supports a finding of one or more violations. PDC staff did not investigate allegations outside of PDC jurisdiction.

Based on staff's review, we found:

- The 21st Legislative District Democratic Central Committee (Committee) is a Bona Fide Political Party Committee for the 21st Legislative District, located in Lynnwood, Snohomish County.
- The Committee maintains two political committees, one exempt (Operations) and one non-exempt (Victory Fund).
- The complaint alleges 2019 and 2020 violations regarding the Committee's Victory Fund.
- Alfred Apodaca, listed on the 2020 Committee registration as 1st Vice Chair, responded on behalf of the Committee, stating
 - "Due to the Covid-19 pandemic, we began to utilize the already-established personal Zoom account of Chair Sharon Holt, not knowing how long we would be restricted from holding our meetings in person. Chair Sharon Holt offered the use of her account as an in-kind contribution, which is being recorded in our

organization's ORCA records with the PDC. Going forward, our organization opened a separate Zoom account dedicated and billed directly to the 21 Dems organization." Apodaca's response also listed expenditures reported on the Committee's Summary Full Campaign Contribution and Expenditure (C-4) reports for June 2020 and December 2020, which listed in-kind contributions from Sharon Holt for "Zoom virtual meetings services."

- Regarding the allegation of failing to report the March 2019 donation of \$100 from the 21st Legislative District Cascade Precinct, Apodaca responding, stating "On March 20, 2019, the organization held a low-cost fundraiser (LCF) at our monthly general meeting by offering tickets for a prize drawing. Mr. Russell had previously collected \$100.00 from members of his Cascade precinct and donated the amount to this event. He did not provide names of the contributors since this was considered an LCF. The total amount raised for the evening was \$166.00, all in cash. The March 22, 2019, \$166 deposit for the LCF, which included the \$100 referenced in this complaint, was made to our bank account on March 22.
- The Committee filed a Monetary Contributions (C-3) report April 3, 2019 listing a \$166 contribution received and deposited March 22, with the contributor listed as "Proceeds from Low-Cost"

Based on these findings staff has determined, in this instance, the alleged violation of RCW 42.17A.235 and RCW 42.17A.240 for failing to timely and accurately disclose contributions, in-kind, expenditures, debts, and loans does not amount to a violation warranting further investigation.

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.

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director