



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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

September 13, 2021

Sent electronically to William Bisson at [kimosmokecannon@aol.com](mailto:kimosmokecannon@aol.com) and Conner Edwards at [cg.edwards53@gmail.com](mailto:cg.edwards53@gmail.com)

Subject: Complaint regarding Washingtonians to Recall Inslee, PDC Case 95815

Dear Mr. Bisson and Mr. Edwards:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on June 30, 2021, and on August 11, 2021, respectively. The complaint alleged that Washingtonians to Recall Inslee, a recall committee in the 2021 election year, may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file contribution and expenditure reports, as required by the statutory scheme.

PDC staff reviewed your allegation(s); the applicable statute(s), rule(s), and reporting requirements; the C-3 and C-4 reports filed by the Washingtonians to Recall Inslee (Committee); and the responses to the complaint provided by C Davis, Treasurer, on behalf of the Committee.

Based on staff's review, we found the following:

- On January 1, 2021, the Washingtonians to Recall Inslee filed a Committee Registration (C-1pc), selecting the Full Reporting Option and listing C Davis as Treasurer.

***Alleged violation of RCW 42.17A.235 and .240 for failure to file timely and accurate reports of expenditure (C-3) and contributions (C-4) reports.***

- Staff reviewed the 27 examples included in the complaint detailing alleged missing contributions not depicted on the C-3 reports or C-3 reports with no occupations of the contributors listed, as required by the law. Out of the 27 examples included as evidence of the alleged missing contributions/failure to list contributor's occupation, staff noted that only one contribution of \$300 from Julie Bacus, was missing from the C-3 reports filed by the Committee in the month of May 2021.
- On May 12, 2021, Julie Bacus wrote a \$300 check payable to Washingtonians to Recall Inslee (check# 10868). Ms. Bacus's check was deposited by the Committee on May 14, 2021, but was never reported on a C-3 report.

- On July 21, 2021, the Committee amended its C-3 report for the week of May 10, 2021, and included the missing \$300 donation received from Julie Bacus (\$150) and Wayne Bacus (\$150) on May 12, 2021.

### ***Melinda Ryan Letter***

- On July 28, 2021, staff received a letter from Melinda Ryan, a volunteer who worked for the Committee, stating in part that: “Enclosed is a document (C-3 report) designating me as a contributor to the Washingtonians to Recall Inslee group in the amount of \$1,230.00. At no time, did I make the contribution. The following is the chain of events that led C Davis and Alexis Wallace to falsify this so called contribution. On May 17, 2021, there was a rally at the area near the Board of Elections office in Olympia. I was the designated “storekeeper” in charge of selling signs, T-shirts, and bumper stickers. There was no table available to assist with record keeping, no forms, no pens, no paper, not even a secure money holder. A woman buying merchandise gave me a green make up type bag to put money in, nothing at all was provided by C Davis, nor Alexis Wallace. There was no record of the buyer’s names, just cash. There was something close to \$1,230.00 of sold items without names of the buyers, or contributors. After the rally, I personally informed C Davis of the amount of which I had no contributors listed and why. C Davis launched into this tirade about how this very thing brought Tim Eyman down, on and on it went. C Davis then said I will have to list you (meaning me) as the contributor of the money without names of the contributors. I said I would never contribute that much. C Davis said he was going to anyway because of Tim Eyman. I then said, I don’t care. In hindsight, I probably should not have said I don’t care but I was so fed up with the day, the disorganization and C Davis’ tirade at me”
- Staff noted that the contributions referenced above should have been reported as proceeds from a low-cost fundraiser and was reported incorrectly by the Committee.
- On August 17, 2021, the Committee, by way of its treasurer, C Davis, amended the C-3 report filed late on July 21, 2021, and listed the \$1,230 contribution received on May 17, 2021, as “Proceeds from low-cost” fundraiser as opposed to Melinda Ryan.

### ***Email from Contributor Randy De Lorto with an Attached Copy of a Missing Check.***

- On August 4, 2021, staff received an email from Randy De Lorto, an individual contributor who contributed \$50 to the Committee, but could not find it on the Committee’s C-3 report for the corresponding period.
- Staff reviewed the email from Ms. De Lorto and the C-3 report filed by the Committee and noted that the contribution was reported correctly by the Committee. It appears that Ms. De Lorto failed to realize that a contribution via check that has two names depicted on the check is normally divided into two and reported as being received from both individuals appearing on the check. In this case, the \$50 dollars check (from Bob De Lorto and Randy De Lorto) was divided into two and reported under the “Small contributions \$25 or less not itemized.”

### ***Complaint from Conner Edwards***

- On August 11, 2021, staff received a complaint from Conner Edwards alleging the Committee “has failed to include the dimensions of the signs purchased in the description/purpose field for three separate expenditures,” and included an attachment depicting the expenditures.
- Staff noted that the Committee failed to report a sufficient description of signs and other campaign related items, as required by WAC 390-16-037. For example, the Committee failed to report the number

of signs purchased from Dave's CBS on May 11 and 19, 2021, in the amount of \$8,356.80 as depicted on the May 2021 C-4 report.

- On September 2, 2021, the Committee amended the May 2021 C-4 report to include the necessary detail describing the various items bought by the Committee for campaign purposes.
- On September 7, 2021, the Committee made additional amendments for March and April C-4 reports to include the necessary detail describing the various items purchased by the Committee for those two months.

Based on these findings staff has determined that, in this instance, failure to timely and accurately disclose certain contributions and expenditures by the Committee does not amount to a violation that warrants further investigation. The Committee treasurer has been responsive and amended all the reports that needed to be amended.

However, pursuant to WAC 390-37-060(1)(b), the Committee will receive a written warning letter concerning its failure to timely and accurately disclose contributions and expenditures in the 2021 election year. The Commission will consider the formal written warning in deciding on further Commission action if there are future violation of PDC laws and rules.

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, you may contact Erick Agina, Compliance Officer at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

Endorsed by:

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
Peter Lavalley, Executive Director

cc: Washingtonians to Recall Inslee

