



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

October 5, 2021

Delivered electronically to Ronald Peltier

Subject: Complaint regarding 2021 Ronald Peltier Campaign, PDC Case 97949

Mr. Peltier,

Enclosed is a copy of an electronic letter sent to James Llewellyn concerning a complaint filed on August 30, 2021. The complaint alleged that the 2021 Ronald Peltier Campaign (Campaign) may have violated RCW 42.17A.240 failing to timely disclose political advertising expenditures undertaken on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for newspaper advertisements and yard signs in support of your candidacy.

Pursuant to WAC 390-37-060(1)(d), you are receiving this formal written warning concerning your Campaign's lack of timely and accurate filing of reports of contribution and expenditure activities undertaken by the Campaign, in accordance with RCW 42.17A.235 and .240. The formal written warning includes staff's expectation you will, in the future, timely and accurately file PDC reports and disclose contribution and expenditure activities in accordance with PDC statutes, rules and reporting requirements.

The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules. The PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have any questions, please contact PDC Compliance Officer Kurt Young by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s _____
Electronically Signed Kurt Young
Compliance Officer

/s _____
Electronically Signed Peter Lavallee
PDC Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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Delivered electronically to James Llewellyn

Subject: Complaint regarding 2021 Ronald Peltier Campaign, PDC Case 97949

Mr. Llewellyn,

The Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed on August 30, 2021, against Ronald Peltier, a candidate for Bainbridge City Council in 2021. The complaint alleged the 2021 Ronald Peltier Campaign (Campaign) may have violated RCW 42.17A.240 failing to timely disclose political advertising expenditures undertaken by his 2021 Campaign on Summary Full Campaign Contribution and Expenditure reports (C-4 reports) for newspaper advertisements and yard signs in support of his candidacy.

PDC staff reviewed the allegations listed in the complaint; the applicable statutes, rules, and reporting requirements; the C-4 reports and amended C-4 reports filed by the Campaign, and the emailed responses from Mr. Peltier and Kate Gormley, Treasurer, to determine whether the record supports a finding of one or more violations. Based on staff's review, we found the following:

- On May 20, 2021, Ronald Peltier filed a Candidate registration with the PDC declaring his candidacy for Bainbridge City Council, Position #7 in 2021, selecting the Full Reporting option and listing Ms. Gormley as Treasurer. Mr. Peltier was elected to the Bainbridge City Council in 2015 and served one four-year term.
- On July 26, 2021, the Campaign timely filed the 7-Day Pre-Primary Election C-4 report covering the period July 13 through 26, 2021, disclosing \$3,095 in monetary contributions had been received during the period, and \$9.95 in expenditures had been made for non-itemized expenses of \$50 or less.
- On July 26, 27, and 28, 2021, the Campaign inadvertently filed the Post-Primary Election C-4 report and two amended Post-Primary C-4 reports covering the period July 27 through August 30, 2021. The Post-Primary Election C-4 report was not due to have been filed until September 10, 2021 and was inadvertently filed early by mistake by the Campaign instead of filing an amended 7-Day Pre-Primary Election C-4 report.
- The Post-Primary Election C-4 report and amended Post-Primary Election C-4 reports disclosed no contribution or expenditure activities had been undertaken, since no activities had been entered into the Online Reporting of Campaign Activities (ORCA) campaign finance software for the C-4 reporting period.

- On September 7, 2021, the Campaign filed an amended 7-Day Pre-Primary Election C-4 report listing the same \$3,095 in contributions received but disclosing new expenditure information totaling \$4,242.74. The new C-4 report information included: (1) a \$2,102.25 expenditure made to the Bainbridge Island Review on July 16, 2021, for a newspaper advertisement that ran on July 30, 2021; and (2) a \$1,000 expenditure made to the Bainbridge Island Review on July 16, 2021, for banner newspaper advertisements that ran during the period July 18 through 24, 2021.
- The amended 7-Day Pre-Primary Election C-4 report also disclosed a \$383.16 expenditure made to Sound Reprographics on July 21, 2021 to print 700 “rack cards”, and two \$373.69 expenditures made to the Kitsap Sun on July 21 and 25, 2021, for full page newspaper advertisements than ran on July 24 and 27, 2021.
- On September 7, 2021, the Campaign timely filed an amended Post-Primary Election C-4 report disclosing \$950 in monetary contributions, \$463.69 for in-kind contributions received during the period, and \$85.70 in total expenditures made. The amended C-4 information disclosed two in-kind contributions that included a \$90 in-kind contribution from the candidate for “used coreplast signs” that he had saved from his 2015 campaign for Bainbridge City Council, and addressed one of the complaint allegations.
- The amended C-4 report also disclosed a \$373.69 in-kind contribution from an individual on August 20, 2021, for a Kitsap Sun newspaper advertisement, and four small expenditures totaling \$84.80 for bank fees and processing fees for online contributions received by the Campaign.
- Mr. Peltier stated his 2021 Campaign is using yard signs that “were purchased during my last campaign for city council, which was in 2015, and were saved and now being re-used in the current election.” He stated there was no money spent for those yard signs this year and added there were about 20 total signs leftover from 2015.
- Mr. Peltier took exception to the allegation made in the complaint stating that the characterization of “a vast number of yard signs” being posted “everywhere to be seen” around the city was an exaggeration. He reiterated there were approximately 20 used yard signs from his 2015 Campaign that were used by his current Campaign, and he stated the Campaign was not aware of the requirement to report the old 2015 signs on his 2021 campaign reports. He stated after being made aware of the requirement to report a value for the signs as an in-kind contribution, the Campaign established the fair market value to be \$90 and disclosed that amount accordingly.
- In her initial response, Ms. Gormley stated that two expenditures for advertising were made by the Campaign to the Bainbridge Island Review newspaper but were not appearing on the PDC website (\$1,000 and \$2,102.25). She stated that she entered the expenditure information into the ORCA software on July 16, 2021 and attached a screen shot from the ORCA report listing the two expenditures.
- Once PDC staff explained that it appeared the wrong C-4 report and amended C-4 report had been filed by the Campaign, the Campaign promptly filed an amended 7-Day Pre-Primary Election C-4 report and amended Post Primary C-4 report disclosing the required information. Ms. Gormley stated that she hoped “this makes it clear that there were no intentional violations of PDC rules” and Mr. Peltier added that his Campaign had some “inadvertent errors and oversights, and were in no way intentional violations of the PDC’s rules.”

Based on these findings, PDC staff found no evidence of a violation that would require conducting a more formal investigation into the complaint or pursuing further enforcement action in this instance.

However, pursuant to WAC 390-37-060(1)(d), the PDC is issuing a formal written warning to the 2021 Ronald Peltier Campaign concerning the lack of timely and accurate filing of reports of contribution and expenditure activities undertaken by the Campaign, in accordance with RCW 42.17A.235 and .240. The 2021 Ronald Peltier Campaign will be advised that the Commission will consider this formal written warning in deciding on further Commission action, should there be future violations of PDC laws or rules.

The PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact Kurt Young by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s

Electronically Signed Kurt Young
Compliance Officer

/s

Electronically Signed Peter Lavallee
PDC Executive Director

cc: 2021 Ronald Peltier Campaign

