

Respondent Name
Whatcom County Republican Party
Complainant Name
Daniel Raas
Complaint Description
Danraas <i>(Tue, 28 Sep 2021 at 4:31 PM)</i> Please see attached
What impact does the alleged violation(s) have on the public?
<p>The Whatcom County Republican Party (WCRP) has inaccurately reported its receipt of funds and the identity of its donors. This secrecy is not compatible with Washington's public policy of full disclosure in campaign funding, RCW 42.17A.001(1), (3), (10) and (11).</p> <p>The WCRP also first reported acceptance of two corporate donations in excess of the permitted limits and later, without correcting its filings or any public explanation, reduced the amounts to come within the allowed limits. The public is entitled to know the true amounts of the WCRP's donations, the identity of its donors and the time that the funds were received. The WCRP's actions damage our right to a transparent election.</p>
List of attached evidence or contact information where evidence may be found
The attached narrative contains the references to WCRP filings with the PDC which support this complaint, identified by date and filing number. All filings were signed by Russell Dzialo, WCRP treasurer, whose contact information is below .
List of potential witnesses with contact information to reach them
WCRP Treasurer: RUSSELL DZIALO BELLINGHAM, WA 98226
Certification (Complainant)
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

HOW MUCH MONEY HAVE THE WHATCOM REPUBLICANS RAISED THIS YEAR?

Nobody knows.

You won't find out on the Whatcom County Republican Party (WCRP)'s page on the Public Disclosure Commission web site, www.pdc.wa.gov, because the WCRP has consistently violated PDC rules, hidden contributor's names and amounts, made uncorrected mistakes, and corrected numbers without explanation. The PDC exists so that true and accurate campaign cash and expenditures are available to the public. The Whatcom County Republican Party makes a mockery of this transparency.

- (1) At the end of 2020 the WCRP reported that it had cash on hand of \$4,039.10. (Form C-4 #110005584, dated Jan. 4, 2021). That balance carries forward to the first report of 2021. But the first report for 2021 shows an opening balance of \$18,420.86 (C-4 #110008503, dated Feb. 7, 2021)). Only \$199.64 in contributions is reported between Jan. 4 and Feb. 7. (Forms C-3 #110008556 \$90.00 and #110008502 \$109.64). Where did the other \$14,621.22 come from? Who wrote these checks to the WCRP and for how much?
- (2) On or about April 10, 2021, the WCRP held an auction. It reported the proceeds of that auction in the following days on a series of Forms C-3 AU, which is used for reporting auction sales. However, six of these C-3 AU are duplicate filings for \$11,440 each: ## 110016629, 110016630, 110016631, 110016632, 110016633, and 110016634. In addition, the next three C-3 AU report the exact same sales in a cumulative total of \$11,440. ## 110016635, 110016636, and 110016637. In all, this over-reports auction proceeds by \$68,640. None of these C-3 AUs have been removed or corrected.
- (3) On May 7, 2021, a week before filing for office opened, the WCRP Contributions page showed a balance of \$233,500.18. This sum is far more than any reporting entity in Whatcom County has reported in recent history. It presumably includes the \$68,640 over-reported above, as well as other receipts that

are not explained by the WCRP C-3 filings. It completely misleads the public and, whether by design or not, intimidates the opposition party and prospective candidates not supported by WCRP. In contrast, on September 6, 2021, the total cash contributions on WCRP's Contributions page totaled \$106,291.93. What happened to the missing \$127,208.25? Only \$68,640 is accounted for by the duplicate auction filings above.

- (4) On September 6, 2021, the WCRP Contributions page showed that the WCRP had collected \$106, 291.93. That number cannot be reconciled with the C-3s and C-4s filed by the WCRP. The WCRP C-4 dated July 26, 2021 (#110036260) shows total contributions as of that date of **\$91,478.22**, which presumably includes the \$14,622.22 carry-over from last year. See (2), above. The WCRP filed several C-3s between July 26 and September 3: August 8, #110039085, \$135.00; August 8, #110039087, \$400.50; August 8, #110039088, \$1,977.66; August 17, #110041179, \$705.76, #110041183 \$1,231.00, #410041183 (amending #41001180), \$229.56; August 23, #410042349, \$441.24; #410042348, \$1,722.85., for a total of **\$6,843.57** as is also reported on the C-4 filed September 13, 2021, #110047671. When these C-3 contributions are added to the previous C-3 contribution sum (see C-4 filed July 26, 2021, #110036260), the year to date contributions total **\$98,321.79**, not **\$106, 291.93**. How much has the WCRP raised?
- (5) On May 7, 2021, the WCRP Contributions page listed its top two individual contributors as Pacific Growers of Blaine, WA, at \$6,990.00 and Asset Advisors of Ferndale, WA, at \$5,775.00. The maximum a business entity can contribute to a political party non-exempt campaign is \$5,500 per election cycle. On

September 6, 2021, Pacific Growers' contribution is listed as \$3,750.00, and Asset Advisors' is \$4,165.00. What happened? Did the corporate donations suddenly become personal donations? Were refunds given? No amendments to filed C-3s are on the PDC web site that explain the reduction of the excess donations from these entities to an allowable amount.

In short, the public cannot trust the financial reports filed by the Whatcom County Republican Party. Accountability and transparency demand explanations.