



**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 • Website: www.pdcc.wa.gov

November 18, 2021

Delivered electronically to bill@billforbremerton.com

Subject: PDC Case 100010

Dear Bill Broughton:

Below is a copy of an electronic letter sent to Sophia Blamey concerning a complaint filed October 20, 2021, with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports and RCW.17A.445 for making loan repayments to a candidate in excess of the \$6,000 limit.

The PDC has dismissed the alleged violation of RCW.17A.445 for making loan repayments to a candidate in excess of the \$6,000 limit in accordance with RCW 42.17A.755(1) and WAC 390-37-070 and will not conduct a more formal investigation into the allegation.

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your failure to timely report contributions and expenditures as required under 42.17A.235 and .240. Staff expects you will, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Peter Lavalley
Executive Director



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November 18, 2021

Delivered electronically to sbblamey@gmail.com

Subject: Complaint regarding Bill Broughton, PDC Case 100010

Dear Sophia Blamey:

The Public Disclosure Commission (PDC) completed its review of the complaint filed October 20, 2021. The complaint alleged Bill Broughton, a 2021 candidate for Bremerton Mayor, violated RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports and RCW.17A.445 for making loan repayments to a candidate in excess of \$6,000 limit.

PDC staff reviewed the allegations; the applicable statutes and rules; the evidence provided in the complaint; information in the PDC's campaign-finance-reporting database; and a response from Bill Broughton, to determine whether the record supports a finding of one or more violations.

We found the following:

- Broughton registered with the PDC on March 2, 2021 as a 2021 candidate for Bremerton Mayor. Broughton was not elected to the position.
- On a C-4 originally timely filed October 11, 2021, Broughton reported an October 6, 2021 loan repayment to Bill Broughton for \$21,989, which is in excess of the \$6,000 limit allowed under RCW.17A.445.
- In response, Broughton stated the repayment was due to a purchase made with his personal credit card for campaign-related materials. Broughton noted the vendor required credit card payment, but there was no credit card associated with the campaign fund.
- On November 9, the Broughton campaign amended the report, listing a \$21,989 expenditure to Bill Broughton, with the purpose noted as reimbursement paid to vendor Audacy for Facebook, Instagram and Snapchat advertising.
- As of September 1, 2021, the campaign had \$33,575.88 in contributions, more than the amount of the expenditure Broughton made to Audacy.

- In response to the alleged violation of 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports, the campaign added information on the dates of its advertising on Facebook and Google, plus the number of printed materials on expenditures for mailers and signs.
- During its investigation, PDC staff noted the Broughton campaign filed its 7-day pre-general C-4, reporting a total of \$11,194.85 in expenditures from October 12 to October 25, 2021, on November 3, 2021. The report was filed eight days late and one day after the 2021 General Election.

Based on these findings, PDC staff has determined that, in this instance, the failure to timely and accurately report contributions and expenditures does not amount to a violation warranting further investigation.

However, Broughton will receive a formal written warning pursuant to WAC 390-37-060(1)(d) concerning the failure to timely report contributions and expenditures. The formal written warning includes staff's expectation Broughton will timely and accurately file PDC reports in the future and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Peter Lavalley
Executive Director