



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

October 7, 2019

Delivered electronically to Senator Jim Honeyford

Subject: Jim Honeyford Complaint Return Cover Letter, PDC Case 30818

Senator Honeyford:

Below is a copy of an electronic letter sent to Dmitri Iglitzin concerning the complaint he filed with the Public Disclosure Commission (PDC). As noted below in the electronic letter to Mr. Iglitzin, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

However, PDC staff is reminding you about the importance of filing timely and accurate C-3 and C-4 reports for all future Campaigns in accordance with PDC laws, rules and reporting requirements.

If you have questions, please contact PDC staff member Kurt Young by e-mail at [kurt.young@pdcc.wa.gov](mailto:kurt.young@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Kurt Young, Compliance Officer

/s \_\_\_\_\_  
Barbara Sandahl, Deputy Director  
For Peter Lavalley, Executive Director



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972



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October 7, 2019

Delivered electronically to Dmitri Iglitzin

Subject: Complaints filed against Senator Jim Honeyford, PDC Case 30818

Mr. Iglitzin:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 30, 2018, against Jim Honeyford, an incumbent State Senator from the 14<sup>th</sup> Legislative District and a candidate seeking re-election to that office in 2014 and 2018. Your complaint alleged that Senator Honeyford may have violated RCW 42.17A.235 and .240 by failing to timely file Monetary Contributions reports (C-3 reports) and Campaign Summary Contributions and Expenditures reports (C-4 reports) disclosing contribution and expenditure activities undertaken by his Campaigns.

PDC staff reviewed the allegations listed in your complaint, the statutes, rules, and reporting requirements for a State Senate candidate, and the C-3 and C-4 reports filed by the Committee to Elect Jim Honeyford (Campaign). Based on staff's review, we found the following:

- On November 6, 2015, James (Jim) Honeyford filed a Candidate Registration (C-1 report) declaring his candidacy for re-election to the Office of State Senator in the 15<sup>th</sup> Legislative District in 2018, selecting the Full Reporting Option, and listing Nate Bridges as the Campaign Treasurer and only Officer.
- Senator Honeyford is an incumbent State Senator from the 15<sup>th</sup> Legislative District since being elected to that office in 1998. Prior to that, Senator Honeyford served as a State Representative from the 15<sup>th</sup> Legislative District from 1994 through 1998.
- Senator Honeyford has one prior PDC violation in PDC Case 11-008 for failing to timely file C-3 and C-4 reports for his 2010 Senate re-election Campaign, in which he was unopposed. A \$250 civil penalty was assessed, of which \$150 was suspended on the condition no violations of RCW 42.17 were committed for four years from the date of the December 10, 2010 Order date.
- Allegation #1: Failure to timely file C-4 reports for December 1, 2013 through April 30, 2014: On May 29, 2014, the Campaign filed five C-4 reports covering the period December 1, 2013 through April 30, 2014, disclosed \$14,900 in monetary contributions received, a \$588 in-kind contribution received from Plum Creek Timber for a December 2013 fundraiser, and \$306 in expenditures that included a \$269 expenditure for Campaign letterhead.

- While not alleged in your complaint, the Campaign also filed a C-3 report on May 29, 2014 disclosed a total of \$100 in monetary contributions that were received on April 26<sup>th</sup> and deposited on April 30, 2014.
- Staff noted that \$14,800 of the monetary contributions received and disclosed on the late filed C-4 reports, were timely disclosed on C-3 reports filed prior to the 2014 Legislative Session Freeze date.
- On September 22, 2017, the Campaign filed an additional C-1 report for the 2018 election, disclosing the same information that was included on the initial C-1 report filed on November 6, 2015.
- Allegation #2: Failure to timely file C-3 reports for November 11, 2015 through November 9, 2016: On September 22, 2017, the Campaign filed seven C-3 reports (one C-3 report disclosed \$0 in contributions had been received) covering the period November 5, 2015 through November 9, 2016, disclosing the receipt of \$5,450 in monetary contributions. The \$5,450 in contributions received were disclosed between 286 and 652 days late.
- While not alleged in your complaint on September 22, 2017, the Campaign filed four C-4 reports covering the period November 5, 2015 through August 31, 2016, disclosing \$4,950 in monetary contributions received, and three expenditures totaling \$379 for the Post Office box rental, stamps and bank service fees.
- The 2018 Campaign disclosed receiving \$132,143 in total contributions and \$130,110 in total expenditures that included \$89,500 in transfers to the Jim Honeyford Surplus Funds Account. In addition, the Campaign timely filed the 21-Day and 7-Day Pre-General Election C-4 reports, and the majority of the weekly required C-3 reports.

Staff would note that the allegations concerning the late filed 2013 and 2014 C-3 and C-4 reports are all beyond the five-year statute of limitations for which PDC staff can take any enforcement action, and the January, February and March 2014 alleged late filed C-4 reports contained no contribution and expenditure activities and were not required C-4 filings.

While the \$5,450 in contributions received were disclosed between 286 and 652 days late by the Campaign, the information was disclosed more than one year prior to the November 5, 2018 general election date.

Based on staff's findings and the facts that the \$5,450 in late reported contributions represented less 4.2 percent of total contributions received, and Senator Honeyford was running unopposed, staff has determined that in this instance, the facts do not warrant further investigation or any enforcement action.

However, PDC staff is reminding Senator Honeyford about the importance of filing timely and accurate C-3 and C-4 reports for all future Campaigns in accordance with PDC laws, rules and reporting requirements.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Kurt Young, Compliance Officer

/s \_\_\_\_\_  
Barbara Sandahl, Deputy Director  
For Peter Lavallee, Executive Director

cc: Senator Jim Honeyford

