



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.pdcca.wa.gov

February 24, 2020

Delivered electronically to "skippyriovf84@hotmail.com"

Subject: Complaint filed by Dmitri Iglitzin, on behalf of the Washington State Democratic Party, PDC Case 30697

Dear: Freeman Moore, treasurer, Chelan County Republican Central Committee

Below is a copy of an electronic letter sent to Dmitri Iglitzin concerning a complaint filed with the Public Disclosure Commission (PDC).

While your response stated the Committee failed to completely and accurately report committee officers during the 2012 and 2013 election cycle, the five-year statute of limitations has expired for the PDC to take enforcement action.

As noted in the letter to Dmitri Iglitzin, the PDC will not be conducting a more formal investigation into these allegations or take further enforcement action in this matter since the Chelan County Republican Central Committee completed a Statement of Understanding (SOU) and paid a \$900 civil penalty acknowledging violations of RCW 42.17A.235 by failing to timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contributions and expenditures undertaken by the Committee in election years 2015, 2016 and 2017.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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February 24, 2020

Delivered electronically to iglitzin@workerlaw.com

Subject: PDC Case 30697

Dear: Dmitri Iglitzin

The Public Disclosure Commission (PDC) completed its review of the complaint you filed January 31, 2018. Your complaint alleged the Chelan County Republican Central Committee violated RCW 42.17A.235 by failing to timely report contributions and expenditures; RCW 42.17A.205 by failing to completely and accurately report committee officers and RCW 42.17A.425 for allowing non-committee officers to authorize expenditures.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response from Freeman Moore, treasurer Chelan County Republican Central Committee; and data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Concerning the failure to completely and accurately report committee officers and allowing non-committee officers to authorize expenditures, Moore stated in his response “at no time was any expenditure authorized by a non-committee officer” however “CCRCC acknowledges that for the years 2012, 2013 the officers were not reported and will amend previously filed forms.” The five-year statute of limitations has expired for allegations related to the 2012 and 2013 election cycles, so the PDC is prevented from taking enforcement action.

Concerning the failure to timely report contributions and expenditures, based on staff’s review we found the following:

- Moore stated in his response, “CCRCC acknowledges it failed to comply with RCW 42.17A.235. CCRCC will comply in the future.”
- The CRCCC failed to file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contributions and expenditures undertaken by the Committee in election years 2015, 2016 and 2017 and completed a Statement of Understanding (SOU) acknowledging violations of RCW 42.17A.235 as detailed below:

Election year 2015

- On December 26, 2017, the Committee filed C-3 and C-4 reports for the 2015 election year, disclosing \$22,967.49 in contributions and \$25,557.16 in expenditures during the 2015

campaign. The reports were filed between 1079 and 715 days late. No candidate contributions were made by the Committee in 2015.

Election year 2016

- On December 26, 2017, the Committee filed C-3 and C-4 reports for the 2016 election year, disclosing \$30,033.76 in contributions and \$39,607.20 in expenditures during the 2016 campaign. The reports were filed between 685 and 350 days late. The Committee made \$1,750 in campaign contributions in 2016.

Election year 2017

- On October 6, 2017, the Committee filed C-4 reports for January through September 2017. The late reports were filed between 269 and 26 days late. No November 2017 C-4 report was filed, and the December 2017 C-4 and C-3 reports were filed timely, on January 10, 2018. The Committee disclosed \$11.68 in contributions received and \$2,753.42 in expenditures for the 2017 campaign. The Committee reported only one contribution in 2017, a \$200 contribution to the Chelan County Republican Women.

As noted above, the CCRCC acknowledged the violation. In addition, the CCRCC made limited expenditures in the form of contributions to candidates during the timeframe covered by the complaint and did timely file C-3 and C-4 reports for the final months of 2017, and all of 2018 and 2019.

The Chelan County Republican Central Committee completed a Statement of Understanding (SOU), paid a \$900 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.235 for failing to timely file the C-3 and C-4 reports listed above. The \$900 penalty assessed in this matter resolves the allegations listed in your complaint.

Based on the above findings and the SOU, staff has determined that, in this instance, this matter does not warrant further investigation. 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 Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s_____

Alice Fiman
Compliance Officer

Endorsed by,

/s_____

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director