



State of Washington  
PUBLIC DISCLOSURE COMMISSION  
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BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON

In Re: Compliance with RCW 42.17A

PDC Case 159241

David Tobin,

Respondent.

Findings of Fact,  
Conclusions of Law, and  
**Order Imposing Fine**

Pursuant to the brief enforcement hearing (brief adjudicative proceeding) notice sent to David Tobin on Dec. 11, 2024, a brief adjudicative proceeding was held on Jan. 8, 2025, remotely from Olympia, WA by live audio and online transmission, to consider whether the Respondent violated RCW 42.17A.235 and 240 as a candidate for the 2024 election cycle by failing to file four mandatory C-4s expenditure reports, the post-primary election C-4 due September 10, 2024, the 21-day pre-general C-4 due Oct. 15, 2024, the 7-day pre-general C-4 due Oct. 29, 2024, and the post-general C-4 due Dec. 10, 2024.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commission Chair Allen Hayward was the Presiding Officer. The Commission staff was represented by Kim Bradford, Deputy Director. The Respondent participated in writing.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. The Respondent was a candidate for County Commissioner of Pacific County.
2. As a candidate for election, the Respondent was required to file the post-primary election C-4 due September 10, 2024, the 21-day pre-general C-4 due Oct. 15, 2024, the 7-day pre-general C-4 due Oct. 29, 2024, and the post-general C-4 due Dec. 10, 2024.
3. The Respondent had filed the missing C-4 reports as of the hearing.
4. The Respondent has one prior violation of RCW 42.17A.235 and RCW 42.17A.240 in PDC Case 150284.

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CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.235 and 240 by failing to file the post-primary election C-4 due September 10, 2024, the 21-day pre-general C-4 due Oct. 15, 2024, the 7-day pre-general C-4 due Oct. 29, 2024, and the post-general C-4 due Dec. 10, 2024.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

**IT IS HEREBY ORDERED that the Respondent is assessed a civil penalty of \$400, with \$200 of the penalty suspended, in accordance with the C-4 penalty schedule set forth in WAC 390-37-143.**

**It is further ordered that the Respondent:**

- 1. Pay the \$200 civil penalty within 30 days of the date of this Order.**
- 2. File all outstanding reports within 30 days of the date of this Order.**
- 3. Commit no further violations of Chapter 42.17A RCW or Title 390 WAC for a period of 4 years from the date of this order or the suspended \$200 will become due and payable without further Commission action.**

If the Respondent fails to pay the non-suspended penalty of \$200 within 30 days or fails to comply with any of the conditions of this Order, the suspended portion of the penalty shall immediately become due without further action by the Commission.

In the event the Respondent fails to pay the non-suspended \$200 civil penalty within 30 days of the date of the Order, PDC staff is directed to refer the matter to collections or to seek a court order compelling compliance with this Order.

Any allegations regarding reporting by the Respondent's 2024 campaign that are not otherwise addressed in this order are hereby dismissed.

Finding, Conclusions & Order  
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This is an **Initial Order** of the Public Disclosure Commission.

Entered this February 5, 2025

Public Disclosure Commission

*Electronically Signed*  
Peter Frey Lavallee  
Executive Director

I, Kim Bradford, certify that I emailed a copy of this order to the Respondent by email on the date stated herein.

Electronically Signed  
Kim Bradford

DATE  
Feb. 5, 2025

## APPEALS OF INITIAL ORDER

### REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request orally or in writing, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1). Staff may ask for written confirmation of oral requests for review.
- **REQUESTS FOR REVIEW MUST BE RECEIVED AT THE COMMISSION OFFICE WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE POSTMARK DATE OF THIS INITIAL ORDER.** Written requests for review should be delivered or mailed to the Washington State Public Disclosure Commission, 711 Capitol Way, Room 206, Box 40908, Olympia, WA 98504-0908.

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

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### FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the final order. *See* WAC 390-37-142(5).

**YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.552.**