



**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

October 31, 2019

Delivered electronically to “abull@chamberway.com, ehillier@rainierconnect.com”

Subject: Complaint filed by John Ver Valen, PDC Case 25197

Dear One Lewis County PAC:

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

As noted in the letter to John Ver Valen, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to timely and accurately file registration reports and to timely and accurately disclose contributions and expenditures. PDC staff expects that you will timely and accurately file all future required reports of registration, contributions, and expenditures. The Commission will consider this formal written warning in deciding on further Commission action, if there are future violations of PDC laws or rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by,

/s

Tabitha Townsend
Compliance Coordinator

/s

Peter Lavallee
Executive Director



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October 31, 2019

Delivered electronically to "jvervalen@yahoo.com"

Subject: Complaint regarding One Lewis County PAC, PDC Case 25197

Dear John Ver Valen:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 11, 2017. The complaint alleged that One Lewis County PAC (Respondent), a political committee, may have violated RCW 42.17A.205, .210 and .215 for failure to timely and accurately file a Political Committee Registration (C-1pc report) and RCW 42.17A.235 for failure to timely and accurately file Cash Receipts, 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.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent's data in the PDC contribution and expenditure database to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Pursuant to RCW 42.17A.205 the Respondent is required to register as a political committee within two weeks of the expectation of receiving contributions or making expenditures in any election campaign.
- On July 26, 2017, The Centralia-Chehalis Chamber of Commerce (Chamber) voted to organize and start One Lewis County PAC and pledged to make a \$15,000 contribution to the Respondent.
- The Respondent filed the C-1pc report on July 31, 2017, designating the Executive Director of the Chamber, Alicia Bulls, as a Treasurer performing ministerial-only duties at the direction of committee officer Coralee Taylor, who was designated the committee manager and media point of contact.
- The complaint alleged that Alicia Bull was not a ministerial-only officer for the Respondent due to the discretion of the Executive Director of the Chamber to direct contribution and expenditure activities for the Respondent, and media statements issued by Alicia Bull on behalf of both the Chamber and the Respondent.
- Ministerial functions are defined by RCW 42.17A.005(36) as "an act or duty carried out as part of the duties of an administrative office without exercise of personal judgment or discretion." Administrative office is further described in WAC 390-05-243(2) as clerical support or recordkeeping activities when directed or approved "by the candidate or political committee officer."
- The Respondent amended their C-1 report on September 25, 2017 to change all officers for the committee, including the addition of CAM Consulting as a ministerial-only Treasurer under the direction of committee manager and social media contact, Duane Taylor.

- The Respondent filed their first C-4 report covering July 1 through July 31, 2017, disclosing \$15,153.95 in contributions and \$1,807.82 in expenditures, on October 5, 2017, 56 days beyond the statutory deadline of RCW 42.17A.235.
- The Respondent designed, produced, and distributed political advertising around and about October 24, 2017, which had both the name of the Chamber and the Respondent but failed to designate which entity was the sponsor and to provide the sponsor's address in accordance with RCW 42.17A.320, and neither the Chamber nor the Respondent reported the value of this political advertising.
- This political advertising was published in The Daily Chronicle, on social media and on websites (The Daily Chronicle online and onelewiscounty.com) and distributed by the Respondent at an open public meeting.
- On October 16, 2019, the Respondent filed an amended C-4 report, report number 100938673, to show an in-kind contribution of \$960.26, from the vendor The Silver Agency, received on October 24, 2017, for "Brochure that was rejected and never printed" 705 days beyond the statutory deadline of RCW 42.17A.235.
- The Respondent has no prior violation with the PDC.

Based on our findings staff has determined that, in this instance, failure to timely and accurately file the registration, contribution and expenditure reports does not amount to a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), One Lewis County PAC will receive a formal written warning concerning failure to timely and accurately file registration reports and to timely and accurately disclose contributions and expenditures. The formal written warning will include staff's expectation that One Lewis County PAC timely and accurately files all future required reports of registration, contributions and expenditures. The Commission will consider the formal written warning in deciding on further 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, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s

Tabitha Townsend
Compliance Coordinator

/s

Peter Lavalley
Executive Director

cc: One Lewis County PAC