



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

January 6, 2020

Delivered electronically to "lund.jami@gmail.com"

Subject: Complaint filed by Walter Smith, PDC Case 24652

Dear Jami Lund:

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

As noted in the letter to Walter Smith, 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.

PDC staff is reminding you about the importance of the timely and accurate disclosure of all contribution and expenditure activities. PDC staff expects in the future that you will timely and accurately file all future PDC reports in accordance with PDC laws and rules.

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

Sincerely,

/s

\_\_\_\_\_  
Tabitha Townsend  
Compliance Coordinator

Endorsed by,

/s

\_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



**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)**

January 6, 2020

Delivered electronically to “[walter@smithdietrich.com](mailto:walter@smithdietrich.com)”

Subject: Complaint regarding Jami Lund, PDC Case 24652

Dear Walter Smith:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 1, 2017. The complaint alleged that Jami Lund (Respondent), a 2015 candidate for School Director for Centralia School District 401 may have violated RCW 42.17A.235 and .240 for failure to timely and accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing monetary and in-kind contributions, debts, loans and expenditures undertaken by the Campaign.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response 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:

- The Respondent filed a Candidate Registration report (C-1 report) selecting the Mini Reporting option on May 11, 2015, and an amended C-1 report on October 28, 2015.
- Pursuant to WAC 390-16-105 the Respondent was exempt from the reporting requirements of RCW 42.17A.225 through 42.17A.240, including filing Monetary Contribution reports (C-3 reports) and C-4 reports, provided the Campaign accepts no more than \$500 from any one source, excluding the candidate's own funds, and raised and spent no more than \$5,000 in the aggregate over the course of the election campaign.
- If the Respondent was not registered under the Mini Reporting option, they would be subject to the reporting requirements of RCW 42.17A.235 and .240 to timely and accurately file C-4 reports, including details for expenditure purposes as stated in WAC 390-16-037, such as printing of political advertising, mailers and radio/tv ads; including number of items and run dates and times.
- The Respondent stated in the response provided on September 11, 2017, that the reports were filed as the campaign was using ORCA to keep record of the contributions and expenditures, and the program prompted the reports to be submitted.
- While the reports were voluntarily submitted, once submitted into the public record the reports were required to accurately and completely disclose detailed descriptions of expenditures undertaken by the Campaign.
- The Respondent has no prior violations with the PDC.

Based on our findings staff has determined that, in this instance, failure to accurately and completely disclose expenditure details does not amount to a finding of a violation that warrants further investigation.

However, PDC staff is reminding Jami Lund about the importance of the timely and accurate disclosure of all contribution and expenditure activities, and the timely and accurate filings of all future PDC reports in accordance with the statutes and 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 or toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s

---

Tabitha Townsend  
Compliance Coordinator

Endorsed by,

/s

---

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Jami Lund