



**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.pdca.wa.gov

October 22, 2018

Delivered electronically to "jackie4fcc@gmail.com"

Subject: PDC Case 40298

Dear Jacqueline Lopez Giddens:

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

As noted below to Michael Killian, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

PDC staff is reminding you about the importance of the timely disclosure of all contribution and expenditure activities, including the 7-Day Pre-Primary Election C-4 report, and the timely filings of all future PDC reports.

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

Sincerely,

/s _____

Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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October 22, 2018

Delivered electronically to jodie@owt.com and clerkmann@gmail.com

Subject: Complaint regarding Jackie Lopez Giddens, PDC Case 40298

Dear Josephine Delvin and Michael Killian:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 22, 2018. Your complaint alleged that Jacqueline Lopez Giddens, a first-time candidate seeking the office of County Clerk for Franklin County, may have violated RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) during the 2018 election campaign.

PDC staff reviewed your allegations, the statutes and rules, the C-3 and C-4 reports filed by the Committee to Elect Jacqueline Lopez Giddens (Campaign), and the responses from Jacqueline Lopez Giddens. As a result of staff's initial review, we found the following:

- On April 6, 2018, Jacqueline Giddens filed a Candidate Registration (C-1 report) declaring her candidacy for County Clerk of Franklin County.
- On August 11, 2018, the Campaign filed the 7-Day Pre-Primary Election C-4 Report disclosing \$0.00 in contributions received and \$179.25 in expenditures made (Report# 100852059). The 7-Day Pre-Primary Election C-4 report is a statutorily required filing that should have been filed on July 31, 2018, covering the period from July 17, 2018 through July 30, 2018. The C-4 report was filed 11 days late.
- On September 10, 2018, the Campaign filed a monthly C-4 Report disclosing \$1,219.35 in contributions received and \$1,219.35 in expenditures made (Report# 100858308). The September C-4 Report was timely filed, covering the period from July 31, 2018 to August 31, 2018. The C-4 Report disclosed expenditures which include: advertising, fair booth rental, fair

balloons, fair fans, fair vendor passes, fair candy, facebook advertising, gift baskets, campaign shirts, raffle items, and gift cards. The price for the fair booth rental is listed as \$740.00.

- The Campaign stated in the response that the \$740.00 expenditure for the fair booth was paid on August 7, 2018 and that the radio ads were paid on August 2, 2017. Jacqueline Lopez Giddens stated that the C-4 report for the items identified in the complaint was timely filed on September 10, 2018, covering the period of July 31, 2018 to August 31, 2018.
- The Campaign provided invoices and receipts from Jacobs Radio which confirmed that the radio ads identified in the complaint were paid on August 2, 2018. The Campaign also provided a receipt from the Benton Franklin Fair & Rodeo which indicated that the fair booth was paid on August 7, 2018. There is sufficient evidence to demonstrate that the fair booth, fair materials, and radio advertisements were paid for during the month of August and were therefore timely disclosed on the C-4 report filed on September 10, 2018.
- Jacqueline Lopez Giddens acknowledged that the 7-Day Pre-Primary Election C-4 report was filed late and explained that it was a mistake. The \$179.25 expenditure on C-4 Report #100852059 was for a meet and greet at a restaurant.

Based on these findings and the following facts, staff has determined that in this instance, the failure to timely and accurately file the contribution and expenditure reports does not amount to a material violation warranting further investigation since: (1) Jacqueline Lopez Giddens is a first-time candidate for public office; (2) The Campaign substantially met all other required filing due dates within the previous 12-month period. (3) The late 7-Day Pre-Primary Election C-4 report represented less than two percent of total monetary and in-kind contributions received.

PDC staff is reminding Jackie Lopez Giddens about the importance of the timely disclosure of all contribution and expenditure activities, including the 7-Day Pre-Primary Election C-4 report, and the timely filings of all future PDC reports.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

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

Sincerely,

/s _____
Micaiah Ragins
Compliance Coordinator

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Jackie Lopez Giddens