



**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

August 24, 2021

Delivered electronically to info@thenewpatriotpac.com and christopher@dhpolficial.com

Subject: PDC Case 94548

Dear New Patriot PAC:

Below is a copy of an electronic letter sent to Jim Lazar concerning a complaint filed June 22, 2021 with the Public Disclosure Commission (PDC) alleging violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) reports and Full Summary Contributions and Expenditures (C-4) reports.

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

PDC staff reminds you about the importance of timely and accurately filing with the PDC and staff expects in the future you will timely and accurately file reports in accordance with PDC laws and rules. Please note, the New Patriot PAC's next required reports are due September 10, 2021.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director



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August 24, 2021

Delivered electronically to jim@jimlazar.com

Subject: Complaint regarding New Patriot PAC, PDC Case 94548

Dear Jim Lazar:

The Public Disclosure Commission (PDC) completed its review of the complaint you filed June 22, 2021. The complaint alleged New Patriot PAC, a Continuing Committee, violated RCW 42.17A.235 and .240 by failing to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) reports and Full Summary Contributions and Expenditures (C-4) reports.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports, the evidence provided in the complaint, and a response from Christopher Gergen, who is listed on the New Patriot PAC Committee Registration as Executive Director, to determine whether the record supports a finding of one or more violations.

We found the following:

- The New Patriot Political Action Committee (New Patriot PAC) registered with the PDC as a continuing committee on January 8, 2021 under Full reporting.
- The Committee lists only one officer, Christopher Gergen, Executive Director. There are no previous registrations for the committee in PDC records.
- The New Patriot PAC lists a bank in Puyallup as its bank information, however the Committee's address is listed as Las Vegas, Nevada.
- On July 19, 2021, the New Patriot PAC filed five C-4 reports and 25 C-3 reports. The reports were filed between 159 and six days late.
- In its C-4 report covering the period of June 1 to July 12, 2021, the New Patriot PAC reported \$5,185 in total contributions and \$4,443.67 in total expenditures to date.
- On August 22, 2021, New Patriot PAC filed four C-3 reports and the C-4 report covering July 13 to July 26, 2021, reporting \$5,390 in total contributions and \$4,453.97 in total expenditures to date. The reports were filed between 12 and 26 days late.
- As noted in the complaint, the largest expenditure was \$2,500 for "entertainment for outdoor event," and other items for the event, "Ignite the Right," including \$857.57 for

lodging and green room for Loren Culp, Dakota Poorman, Frank Beals, Shannon Halls, Andy Olsen, Otto Weiters and Christopher Gergen, and \$375 for toilets.

- In response, Gergen stated “On July 2, 2021, I spoke to (PDC staff) Alice Fiman at 12:10 PM PST and explained the New Patriot PAC's lack of filing was due to our belief that we were on the mini-reporting schedule and NOT the regular reporting schedule. This misunderstanding led to the lack of reporting. Ms. Fiman was kind enough to send reporting resources to teach us how to file the reports properly. We reviewed these resources throughout last week and plan to submit the proper reports by close of business on July 16, 2021, and bring all of these reports up to date. As stated to Ms. Fiman on July 2, 2021, I have downloaded all the bank statements for the PAC and have them ready to submit should the PDC have any further questions regarding our spending (which was less than \$5,000) and our fundraising (also less than \$5,000). We are hopeful to satisfy the complaint and close this case as soon as possible. All reporting will be on schedule and in accordance with standard reporting as required by the PDC.”
- As noted above, the New Patriot PAC filed its required PDC reports. The Committee’s next required reports are due September 10, 2021.

Based on these findings, and the fact the New Patriot PAC did not support or oppose any candidates or ballot measures to date, PDC staff has determined that, in this instance, the failure to timely and accurately report contributions and expenditures does not amount to a violation warranting further investigation. PDC staff is reminding New Patriot PAC about the importance of timely filing required reports in accordance with PDC laws 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, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Kim Bradford
Deputy Director
For Peter Lavalley
Executive Director