



State of Washington

PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

June 18, 2019

Sent electronically to Brett Malin

Subject: Complaint filed against Pacific County Republican Party, PDC Case 30901

Mr. Malin:

Below is a copy of an electronic letter sent to Dmitri Iglitzin concerning the complaint he filed with the Public Disclosure Commission (PDC) against the Pacific County Republican Party for activities undertaken during calendar years 2016 and 2017. As noted in the letter to Mr. Iglitzin, the PDC will not be conducting a more formal investigation into the allegations or take enforcement action in this matter.

PDC staff is reminding the Pacific County Republican Party and its Officers about the importance of timely filing C-3 and C-4 reports disclosing contribution and expenditure activities as required by PDC laws, rules and the reporting requirements for a continuing Bona Fide Political Party Committee.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

s/_____
BG Sandahl, Deputy Director
For Peter Lavallee, Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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June 18, 2019

Sent electronically to Dmitri Iglitzin

Subject: Complaint filed regarding Pacific County Republican Party, PDC Case 30901

Dear Mr. Iglitzin:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed against the Pacific County Republican Party, a bonafide County political party committee. The complaint alleged that the Pacific County Republican Party (Committee) may have violated RCW 42.17A.235 by failing to timely file Monetary Contributions reports (C-3 reports) and Summary Full Campaign Contributions and Expenditures reports disclosing contribution and expenditure details undertaken during calendar years 2016 and 2017.

PDC staff reviewed the allegations listed in the complaint and exhibits, the statutes, rules and reporting requirements for a political party committee, the C-3 and C-4 reports filed by the Pacific County Republican Party (Committee), and the response from Committee Officers. Based on staff's review, we found the following:

- On February 28, 2017, the Committee filed a New Committee Registration (C-1pc report) as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option, and listing Brett Malin as Committee Treasurer and Manager, Aaragon Markwell as Chair, and Nansen Malin as Vice-Chair.
- On February 18, 2016, the Committee filed an Amended C-1pc report as a Continuing Bona Fide Political Party Committee, selecting the Full Reporting Option, and listing Brett Malin as Committee Treasurer and Manager, Nansen Malin as Chair, and Aaragon Markwell as Vice-Chair.
- Your complaint alleged that the Committee failed to timely disclose 35 expenditures totaling \$6,976 on required C-4 reports, and seven deposits for contributions received totaling \$4,758 on the required C-3 reports during calendar years 2016 and 2017.
- Staff's review found that in 2016, the Committee disclosed receiving a total of \$11,269 in contributions received that included \$5,364 in funds carried forward from 2015, made \$9,055 in total expenditures made with \$2,215 cash on hand balance. In 2017, the Committee disclosed receiving a total of \$11,730 in contributions received that included \$2,215 in funds carried forward from 2016, made \$4,950 in total expenditures made with a \$6,779 cash on hand balance.
- Staff's review confirmed the Committee failed to timely file C-4 reports disclosing 35 expenditures totaling \$6,976 during calendar years 2016 and 2017. The late filed C-4 reports disclosed 2016 Republican Presidential Party Caucus rental/costs for Pacific County, the costs of renting a fair booth, candy for summer parades, and the overhead related costs of running a party committee such as meeting rentals, PO Box rental, meeting supplies, food and beverages, etc.

- However, staff would note that the Committee expenditure information was only disclosed between four to 26 days late, and none of the expenditures were used to make monetary contributions or to support or oppose candidates or ballot propositions in political advertisements.
- Staff's review also confirmed that the Committee failed to timely file C-3 reports disclosing seven deposits for contributions received totaling \$4,758 during calendar years 2016 and 2017. Three of the late filed C-3 reports totaled \$3,818, disclosed proceeds from Low Cost Fundraisers conducted by the Committee and were filed four to 21 days late in May of 2016 and 2017.
- The remaining late filed contributions received included three C-3 reports disclosing contributions from multiple contributors totaling \$535, \$135 and \$70 respectively, and one C-3 report disclosed a \$200 contribution from an individual and were filed between 21 to 39 days late. Only one of the C-3 reports disclosed contributor information for a contribution received close to an election being held, and that C-3 report listed a \$200 contribution had been received from one individual on July 28, 2017.
- The Committee timely filed the May 2018, the 7-Day Pre-Primary and Post-Primary C-4 reports, the 21-Day and 7-Day and Pre-General Election C-4 reports, and the Post-Primary and Post-General Election C-4 reports, as well as the majority of the C-3 reports. In addition, the Committee has timely filed its C-3 and C-4 reports for January 1 through May 31, 2019.

Based on the findings and the facts that: (1) the Committee is a small, relatively inexperienced political party organization run by volunteers, with no prior PDC violations; (2) the late filed expenditures were for the Committee's internal party building activities and none of the alleged late reported expenditures or contributions were used to make contributions to candidates or political committees for the 2016 and 2017 election cycles; and (3) the Committee substantially complied with the reporting requirements for calendar year 2018 and the first five months of this year, in this instance, does not amount to a finding actual violations warranting further investigation or enforcement action.

PDC staff is reminding the Pacific County Republican Party about the importance of filing timely and accurate C-3 and C-4 reports, including for the remainder of calendar year 2019 and especially in 2020, in accordance with PDC laws and rules.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

s/_____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Pacific County Republican Party