



**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.pdcca.wa.gov

May 11, 2023

Mailed and sent electronically to Raymond Clough

Raymond Clough
Post Office Box 44
Dallesport, WA 98617-0044

Subject: Raymond Clough Brief Order and Cover Letter, PDC Case 111409

Dear Raymond Clough,

Enclosed is a copy of the Public Disclosure Commission's Order Imposing Fine that was entered in the above-referenced case.

At the April 18, 2023, Brief Enforcement hearing, the Presiding Officer assessed a total civil penalty of \$150 in accordance with WAC 390-37-143 against your 2018 candidacy, payable within 30 days of the date of this Order, and which is **due no later than Friday, June 9, 2023.**

Please make the check or money order payable to "WA State Treasurer," referencing the case number in the memorandum field, and mail the payment to the following address:

Public Disclosure Commission
PO Box 40908
Olympia, WA 98504-0908]

Thank you for your prompt attention to this matter. If you have questions, please contact us by email at pdcc@pdcc.wa.gov

Sincerely,

/s Electronically Signed Kurt Young
PDC Compliance Officer

Enclosure: Initial Order



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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

**BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON**

In Re: Compliance with RCW 42.17A

Raymond Clough, 2018 Candidate for Klickitat
County Commissioner

Respondent.

PDC Case 111409

Findings of Fact,
Conclusions of Law,
and

Order Imposing Fine

Pursuant to the notice of brief enforcement hearing (brief adjudicative proceeding) electronically sent to Raymond Clough on March 30, 2023, a brief adjudicative proceeding was held on April 18, 2023, remotely from Olympia, WA by live audio and online transmission. The purpose of the hearing was to consider whether Raymond Clough, a 2018 Candidate for Klickitat County Commissioner, violated RCW 42.17A.235 & .240 for failure to file Summary, Full Campaign Contribution and Expenditure reports (C-4) reports and Monetary Contributions reports (C-3 reports) as required for a candidate under the Full Reporting Option for the 2018 election cycle.

The hearing was held in accordance with Chapters 34.05 RCW, 42.17A RCW and Chapter 390-37 WAC. Commissioner Nancy Isserlis served as the Presiding Officer. The Commission staff was represented by Kurt Young, Compliance Officer. Also in attendance for Commission staff were Kim Bradford, Deputy Director and Tabitha Townsend, Compliance Coordinator. The Respondent did not participate at the hearing.

Having considered the evidence, the Presiding Officer finds as follows:

FINDINGS OF FACT

1. On May 2, 2018, Raymond Clough filed a Candidate Registration (C-1 report) declaring his candidacy for the office of Klickitat County Commissioner in 2018 as an “Independent” candidate, selecting the Full Reporting Option and listing himself as the Campaign Treasurer.
2. While Mr. Clough selected the Full Reporting Option, he failed to file any C-3 and C-4 reports during the 2018 election cycle, despite his name appearing on both the 2018 primary and general election ballots.
3. Mr. Clough has no prior PDC violations, and staff could not find any other complaints or other PDC staff notifications that he failed to file reports during the 2018 election cycle.

4. PDC staff's review found that the 2018 Campaign for Klickitat County Commissioner was the only election in which Mr. Clough was a candidate for public office in Washington State.
5. Mr. Clough failed to provide a formal response to the complaint, despite PDC staff sending email communications to him on August 10, 2022; September 22, 2022; October 26, 2022; November 1, 2022; and February 24, 2023.
6. Mr. Clough did not participate at the Brief Hearing, and he did not provide any written testimony or correspondence for the Presiding Officer to consider.

CONCLUSIONS OF LAW

Based on the above facts, as a matter of law, the Presiding Officer concludes as follows:

1. This matter was duly and properly convened, and all jurisdictional, substantive, and procedural requirements have been satisfied.
2. The Respondent violated RCW 42.17A.235 and RCW 42.17A.240 by failing to file any C-3 or C-4 reports during the 2018 election cycle as a candidate for Klickitat County Commissioner registered under the "Full Reporting" option.

ORDER

ON the basis of the foregoing Findings of Fact and Conclusions of Law,

1. **IT IS HEREBY ORDERED that the Respondent is assessed a total civil penalty of \$150, in accordance with the Brief Enforcement penalty schedule set forth in WAC 390-37-143, which is payable within 30 days of the date of the Order.**

This is an **Initial Order** of the Public Disclosure Commission.

Entered this 11th day of May 2023.

Public Disclosure Commission

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director



I, Kurt Young, certify that I mailed a copy of this order to the Respondent at their respective address postage pre-paid, on the date stated herein. I certify that I also emailed a copy of this order to the Respondent at their email address of record.

/s/ Kurt Young

Date: 05/11/2023

APPEALS OF INITIAL ORDER

REVIEW OF INITIAL ORDER - BY THE COMMISSION

You may request that the full Commission review this initial order. To seek review, you must:

- Make the request by email, stating the reason for review, and identifying what alleged errors are contained in the initial order. *See* WAC 390-37-144(1).
- All requests for review must be submitted electronically to pdcc@pdc.wa.gov **REQUESTS FOR REVIEW MUST BE RECEIVED BY THE COMMISSION WITHIN TWENTY-ONE (21) CALENDAR DAYS AFTER THE THIS INITIAL ORDER WAS ELECTRONICALLY DISTRIBUTED TO YOU.**

If review of this initial order is timely requested, the full Commission will hear the matter. If the Commission is unable to schedule a meeting to consider the request within twenty (20) calendar days, this initial order becomes a final order, and any request for review will automatically be considered a request for reconsideration of a final order. *See* WAC 390-37-144(4). The matter would then be scheduled for consideration and disposition at the next Commission meeting at which it is practicable to do so.

A Respondent does not need to pay a penalty until after the Commission rules on a request for review of an initial order.

FURTHER APPEAL RIGHTS – SUPERIOR COURT

If the Commission does not receive a request for review of this initial order within twenty-one (21) calendar days, the initial order shall be the FINAL ORDER. *See* WAC 390-37-142(7).

YOU HAVE THE RIGHT TO APPEAL A FINAL ORDER TO SUPERIOR COURT, PURSUANT TO THE PETITION FOR JUDICIAL REVIEW PROVISIONS OF RCW 34.05.542.