



**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

January 9, 2023

Delivered electronically to Vickie Raines via email at vickie_raines@hotmail.com

Subject: Complaint filed by Robert Parker, PDC Case #113544

Dear Vickie Raines:

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

As noted in the letter to Robert Parker, 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.

However, pursuant to WAC 390-37-060(1)(d), this serves as a formal written warning concerning your failure to comply with the filing requirements noted in the enclosed letter sent to Mr. Parker. Staff expects you to timely file with all necessary detail required reports of contributions and expenditures in future years. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Tanya Mercier at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director



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January 9, 2023

Delivered electronically to Robert Parker via email at recordstransferacct@gmail.com

Subject: Complaint regarding Vickie Raines, PDC Case #13544

Dear Robert Parker:

The Public Disclosure Commission (PDC) has completed its review and assessment of the complaint you filed on October 19, 2022. The complaint alleged that Vickie Raines, an incumbent candidate for Grays Harbor County Commissioner, may have violated RCW 42.17A.235 and RCW 42.17A.240 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign.

PDC staff reviewed the allegation(s); the applicable statutes, rules, and reporting requirements; the response(s) provided by the Respondent; the applicable PDC reports filed by the Respondent; the Respondent's data in the PDC contribution and expenditure database; and other relevant information, to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- Vickie Raines previously ran and won election for Grays Harbor County Commissioner in 2014 and 2018. On March 30, 2022, Vickie Raines filed a Candidate Registration (C-1) with the PDC declaring her candidacy for re-election to the position of County Commissioner for Grays Harbor County. The candidate selected the "Mini Reporting" option and listed Danice Wikander as Treasurer for the 2022 Campaign. In July 2022, Ms. Raines requested approval to go from the "Mini Reporting" option to "Full Reporting" option and was granted permission on September 28, 2022. Between July and September, the Campaign worked with PDC Filer Assistance to bring the C-3 and C-4 reports up to date.
- You alleged the "Candidate is hiding campaign expenses by not timely filing the C4 due on 10-18-22. In addition, the candidate has made a practice of washing her campaign expenses through her personal bank accounts which avoids the transparency to the public of what is actually being purchased specifically and from which vendors." You further cited several examples of how you thought Ms. Raines was deceiving the public. Your full complaint is available on the PDC website as part of our electronic filing.
- In response to the complaint and additional questioning by the PDC Compliance Officer, Ms. Raines indicated that she was using personal funds to pay for services indicated in the campaign reports and that she donated those payments for service to her campaign without expectation of repayment. Payments made to the web master and to the campaign

treasurer were at Fair Market Value or slightly below. Ms. Raines also provided additional details about the media buys indicated in her reporting and she clarified that she was reusing yard signs from her 2014 campaign and reported expenses associated with the yard signs were to refurbish the 2014 signs as well as for the purchase of 100 new yard signs. Ms. Raines's full response is available on the PDC website as part of our electronic filing.

- Upon review of reports submitted by the Campaign, staff noted the Campaign worked with PDC Filer Assistance to bring the Campaign's reports into compliance with "Full Reporting" requirements, as part of the process to switch from "Mini Reporting." The reports for the period starting 03/29/22 through 8/31/22 were submitted timely and provided adequate detail in the C-3 reports for contribution of Personal Funds and in the C-4 reports for In-Kind Contributions paid for by the candidate with personal funds. However, beginning with September 2022 reporting, the required detail for In-Kind Contribution "Description" and Expenditure "Purpose" on the C-4 reports was not adequate to allow the public a full understanding of what was being paid for by the Campaign. There was also a reporting error related to a contribution and then refund of that contribution for Rich and Kristin Hartman. And in a couple of instances, the Occupation and Employer detail was missing from contributors who contributed over \$100. It was further found, that during the month prior to the election, two C-3 reports were each filed approximately two weeks late and the C-4 report for period 9/1/22-10/17/22 due on 10/18/22 was initially filed on 9/9/22 but the information was not correctly represented until an amendment on 12/29/22.
- Staff noted, per WAC 390-17-305, that the candidate's use of personal funds are allowable as a contribution to their Campaign. There are however reporting requirements the Campaign must comply with when disclosing candidate personal funds. PDC staff directed the Campaign to the PDC website for guidance on [disclosing in-kind contributions](#). Staff also directed the Campaign to the PDC website for guidance when campaign funds are used for [media buys](#). The Campaign has responded to the provided guidance, and again utilized PDC Filer Assistance, to amend many reports and as of December 29, 2022, the Campaign's reporting is determined adequate.
- Ms. Raines does not have previous reminders, warnings, or violations of PDC requirements related to RCW 42.17A.235 or .240.

Ms. Raines took prompt action to respond to the allegations and made her Treasurer aware of the reporting issues. Both Ms. Raines and her Treasurer have worked with PDC staff to remedy identified issues in the Campaign's reporting.

Based on our findings staff has determined that, in this instance, there was oversight in reporting adequate detail in C-3 and C-4 reports, and to file reports timely, but this was inadvertent and does not amount to a violation that warrants further investigation.

Pursuant to WAC 390-37-060(1)(d), however, Vickie Raines will receive a formal written warning concerning failure to adequately disclosure "Description" and "Purpose" details of all contribution and expenditures and to timely file reports according to PDC guidance. The formal written warning will include staff's expectation that Vickie Raines timely file with all necessary detail required reports of contributions and expenditures in future years. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or 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 Tanya Mercier at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s/ Electronically signed

Tanya Mercier
Compliance Officer

Endorsed by,

/s/ Electronically signed

Peter Frey Lavalley
Executive Director

cc: Vickie Raines