



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against

William Campbell

Respondent.

PDC Case 115649

Notice of Administrative Charges

I. JURISDICTION

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the state campaign finance and disclosure laws; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

II. ALLEGATIONS

2. PDC Staff alleges that the Respondent, William Campbell, violated: (1) RCW 42.17A.205, by failing to file the Committee Registration Statement (C-1pc) due within two weeks of becoming a political committee; and (2) RCW 42.17A.235 and RCW 42.17A.240 by failing to timely disclose monetary contributions received on Monetary Contributions reports (C-3 reports), and by failing to timely disclose expenditures made on Summary Full Campaign Contribution and Expenditure reports (C-4 reports).
3. The Respondent violated RCW 42.17A.205, .235 and .240 by:
 - a. Failing to register as a political committee within two weeks of raising and spending funds to support Richard “Rick” Kuss or oppose John Gese, both 2022 general election candidates for Kitsap County Sheriff.

- b. Failing to file C-3 and C-4 reports disclosing the receipt of contributions and expenditures made in support of Rick Kuss or in opposition to John Gese.

III. FACTS

4. Richard “Rick” Kuss was a candidate for Kitsap County Sheriff in the November 8, 2022, general election.
5. Mr. Kuss lost to his opponent, John Gese, after receiving 50,875 votes or 41.82% of the total votes cast.
6. After the Kitsap County election results were certified on November 29, 2022, six registered voters (“the group”), including William Campbell, Marianne & Michael Gustavson, Martha Mioni, Gerald Chaney and Ron Rice, requested a manual recount of the Kitsap County Sheriff’s race. The group was supportive of candidate Rick Kuss.
7. On December 1, 2022, the group, with Mr. Campbell acting as chairman, submitted the written request and paid a \$31,060.50 cash deposit for the recount of the 2022 Kitsap County Sheriff’s race.
8. The funds used towards the \$31,060.50 total deposit on December 1, 2022, consisted of \$31,010.50 in Mr. Campbell’s personal funds and a \$50 cash donation made by group member Martha Mioni.
9. Mr. Campbell received a \$1,000 check from group members Marianne & Michael Gustavson dated November 30, 2022, which was deposited into Campbell’s personal bank account via mobile deposit. The check was intended to reimburse a portion of Mr. Campbell’s original \$31,010.50 out-of-pocket expenditure.

IV. LAW

RCW 42,17A.005(41) states: "Political committee" means any person (except a candidate or an individual dealing with the candidate's or individual's own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition."

RCW 42.17A.205 states, in part: (1) Every political committee shall file a statement of organization with the commission. The statement must be filed within two weeks after organization or within two weeks after the date the committee first has the expectation of receiving contributions or making expenditures in any election campaign, whichever is earlier. A political committee organized within the last three weeks before an election and having the expectation of receiving contributions or making expenditures during and for that election campaign shall file a statement of organization within three business days after its organization or when it first has the expectation of receiving contributions or making expenditures in the election campaign.”

RCW 42.17A.235 and **RCW 42.17A.240** require political committees to file timely, accurate reports of contributions and expenditures. Under the full reporting option, until five months before the general election, C-3 and C-4 reports are required monthly when contributions or expenditures exceed \$200 since the last report; on the twenty-first day and the seventh day immediately preceding the date on which the election is held; and on the tenth day of the first month after the election.

RESPECTFULLY SUBMITTED this 10th day of September 2024.

Electronically Signed Peter Frey Lavallee

Peter Frey Lavallee
Executive Director