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

In Re: The Matter of Enforcement Action  
Against:

PDC CASE NO. 115649

FINAL ORDER

WILLIAM CAMPBELL,  
  
Respondent.

This matter was heard by the Washington State Public Disclosure Commission (PDC, Commission) on November 14, 2024, by telephonic, and online streaming access. The hearing was held at a Special Meeting of the Commission in accordance with Chapters 34.05, 42.17A and 42.30 RCW, and Chapter 390-37 WAC.

Commissioners present online were Allen Hayward, Commission Chair (presiding), J. Robert Leach (Commission Vice-Chair), and Commissioners Nancy Isserlis, Douglass North, and James Oswald. Also present online were Assistant Attorney General John S. Meader representing the Commission, Assistant Attorney General Susie Giles-Klein, representing PDC Staff, and Jennifer Hansen, PDC Compliance Officer. Notice of the Special Meeting was provided to the Respondent and he appeared on his own behalf. The proceeding was open to the public and recorded.

The Commissioners had before them the following materials:

PDC Staff exhibits:

1. Complaint submitted by Conner Edwards, filed with PDC Staff on December 26, 2022;
2. PDC Staff's correspondence with William Campbell, received January 20, 2023;
3. Rick Kuss's Cash Receipts Monetary Contributions Report (C-3 report), filed with the PDC on September 18, 2022;
4. Screenshot of GiveSendGo online fundraising campaign entitled "Supporting Hand Recount for Election Integrity," created by "Friends of Rick Kuss," undated;
5. Correspondence between William Campbell and PDC Staff and internal PDC Staff communications, dated December 5, 2022, through December 27, 2022;
6. Transcript of PDC Staff's first interview of William Campbell from June 26, 2023;
7. Letter from William Campbell and others to Kitsap County, requesting a recount of the 2022 General Election for Kitsap County Sheriff, with receipt for \$31,060.50 deposit, dated November 30, 2022;
8. Correspondence between PDC Staff and William Campbell, undated;
9. Transcript of PDC Staff's second interview of William Campbell from February 14, 2024;
10. Copy of check from Marianne and Michael Gustavson to William Campbell for \$1,000, dated November 30, 2022;
11. Correspondence between PDC Staff and Martha Mioni, dated June 19, 2024;
12. Report of Investigation for PDC Case No. 115649.
  - PDC Witness and Exhibit List, dated November 6, 2024, with Exhibits 1-12 attached, signed by Assistant Attorney General Susie Giles-Klein;
  - PDC Enforcement Hearing Notice, dated October 11, 2024, for a hearing to be held on November 14, 2024;
  - Notice of Administrative Charges, dated September 10, 2024, signed by Executive

1 Director Peter Lavallee.

2 Respondent's Exhibits:

3 A. List of voicemails #7-13, with transcript of voicemail #10;

4 B. Transcript of verbal comment from William Campbell dated January 26, 2023;

- 5 • Respondent's written comments with "...alternative perspective to consider for  
6 PDC Case 115649 Report of Investigation."  
7

8 **I. FINDINGS OF FACT**

9 This matter involves Respondent William Campbell, acting Chairman of a group of six  
10 registered voters who sponsored a recount of the November 8, 2022, Regular Election for Kitsap  
11 County Sheriff.

12 The PDC alleges the group chaired by Mr. Campbell acted as a political committee and  
13 violated RCW 42.17A.205 by failing to file the Committee Registration Statement (C-1pc) due  
14 within two weeks of becoming a political committee; and violated RCW 42.17A.235 and RCW  
15 42.17A.240 by failing to timely disclose monetary contributions received on Monetary  
16 Contributions Reports (C-3 reports) and by failing to timely disclose expenditures made on  
17 Summary Full Campaign Contribution and Expenditure Reports (C-4 reports).  
18

19 1. On or about December 1, 2022, a group of six registered voters, consisting of  
20 William Campbell, Marianne and Michael Gustavson, Martha Mioni, Gerald  
21 Chaney, and Ron Rice, submitted a written request for a recount of the November  
22 8, 2022, election for Kitsap County Sheriff.  
23

24 2. These voters were supporters of Rick Kuss and the Respondent had personally  
25 contributed \$552 to the Kuss campaign. After the election, the Respondent spoke  
26

1 to Rick Kuss about the recount and understood he was supportive of the effort.  
2

3 3. The Respondent submitted a \$31,060.50 cash deposit to the Kitsap County  
4 Auditor on December 1, 2022, that included \$31,010.50 of his own funds with  
5 Martha Mioni donating the remaining \$50.00. The Respondent was later  
6 reimbursed \$1,000 by Marianne and Michael Gustavson.  
7

8 4. The results of the manual recount found five additional votes should be counted  
9 for Rick Kuss and one additional vote for his opponent, John Gese.  
10

11 5. On December 5, 2022, Respondent contacted the PDC and stated “I am not part  
12 of a political party or campaign, however I am biased in favor of Mr. Kuss. The  
13 other five voters share my bias.” The Respondent further commented that he and  
14 the other members “pooled the money” for the recount effort. PDC Staff provided  
15 guidance that the group qualified as a political committee and needed to register  
16 and file the appropriate reports. Respondent disagreed with this assessment.  
17

18 6. On December 26, 2022, PDC Staff received a complaint alleging that the group  
19 chaired by the Respondent had acted as a political committee and had failed to  
20 file the Committee Registration Statement (C-1pc), the Monetary Contributions  
21 Reports (C-3 reports), and the Summary Full Campaign Contribution and  
22 Expenditure Reports (C-4 reports). As of the date of the enforcement hearing  
23 those reports had not been filed.  
24

25 7. In his January 20, 2023, response to further PDC Staff inquiries, the Respondent  
26

1 stated he was introduced to the recount effort via a social media post with a link  
2 to a GiveSendGo online fundraiser. That campaign was created by “Friends of  
3 Rick Kuss,” which is not a committee registered with the PDC.  
4

5 8. On March 22, 2023, the PDC held an Initial Hearing (Case Status Review  
6 Hearing), after opening a formal investigation for PDC Case 115649 concerning  
7 the Respondent.  
8

9 9. The Respondent was interviewed on June 26, 2023, and in response to a  
10 subpoena, was interviewed under oath on February 24, 2024. At this interview  
11 he stated Sheriff’s candidate Rick Kuss had been supportive of his efforts.  
12

13 10. During testimony at the hearing, the Respondent confirmed his earlier statements  
14 to PDC Staff that his purpose for the recount was only to check the accuracy of  
15 the County’s machine count of the votes and was not to support or oppose any  
16 candidate.  
17

## 18 **II. CONCLUSIONS OF LAW**

19 1. The Commission has jurisdiction over this proceeding pursuant to Chapter  
20 42.17A. RCW, the State campaign finance and disclosure law; Chapter 34.05  
21 RCW, the Administrative Procedure Act; and Title 390 WAC.  
22

23 2. RCW 42,17A.005(41) defines "Political committee" as any person (except a  
24 candidate or an individual dealing with the candidate's or individual's own funds  
25  
26

1 or property) having the expectation of receiving contributions or making  
2 expenditures in support of, or opposition to, any candidate or any ballot  
3 proposition. Here, the group used its pooled funds to request a recount in  
4 support of a candidate. The group was exclusively comprised of supporters of  
5 the losing candidate for Sheriff, their effort began as a result of a fundraising  
6 effort supporting the candidate, and they had that candidate's verbal support for  
7 the effort. Under these facts the group chaired by the Respondent was a  
8 political committee.  
9

10 3. RCW 42.17A.005(20) defines the election cycle as extending to December 31st  
11 of the year of the general election. The funds to pay for the recount were  
12 deposited with the County Treasurer on December 1, 2022, within the election  
13 cycle.  
14

15 4. As a political committee, the group was required by RCW 42.17A.205 to file a  
16 Committee Registration Statement (C-1pc) due within two weeks of becoming a  
17 political committee; and was required by RCW 42.17A.235 and RCW  
18 42.17A.240 to timely disclose monetary contributions received on Monetary  
19 Contributions Reports (C-3 reports) and timely disclose expenditures made on  
20 Summary Full Campaign Contribution and Expenditure Reports (C-4 reports).  
21 The group chaired by the Respondent failed to do so.  
22  
23

### 24 **III. ORDER**

25 This Order will be the Final Order. After consideration of the mitigating and  
26 aggravating factors, arguments of counsel and the Respondent, the exhibits and witness

1 testimony, the Findings of Fact, and the Conclusions of Law, the Commission finds the group  
2 chaired by the Respondent is a political committee as defined under RCW 42.17A.005(41) and  
3 failed to file a Committee Registration Statement (C-1pc) within two weeks of becoming a  
4 political committee. The group further violated RCW 42.17A.235 and RCW 42.17A.240 by  
5 failing to timely disclose monetary contributions received on Monetary Contributions Reports  
6 (C-3 reports) and timely disclose expenditures made on Summary Full Campaign Contribution  
7 and Expenditure Reports (C-4 reports).


8  
9 The Respondent is ordered to:

- 10 1. a. File the missing Committee Registration Statement (C-1pc);  
11 disclose its monetary contributions received on Monetary Contribution  
12 Reports (C-3 reports), and disclose its expenditures on a Summary Full  
13 Campaign Contribution and Expenditure report (C-4 report) within 30  
14 days of the date of this Final Order.

15  
16 SO ORDERED this 20 day of November, 2024.

17 WASHINGTON STATE PUBLIC  
18 DISCLOSURE COMMISSION

19 FOR THE COMMISSION:

20   
Nancy Isserlis (Nov 20, 2024 09:54 PST)

21 Nancy Isserlis, Commissioner,  
22 and on behalf of Commissioners  
Douglass North and James Oswald

23 *This order sent by email to:*  
24 William Campbell, Respondent,  
5629 Minard Road W.  
25 Bremerton, WA 98312  
[cbcampbell56@gmail.com](mailto:cbcampbell56@gmail.com)

26 I, Jennifer Hansen, certify that I emailed a copy  
of this order to the Respondent at his respective email  
address.

  
Jennifer Hansen (Nov 20, 2024 10:00 PST)

Signed

Date

1 Susie Giles-Klein,  
Assistant Attorney General  
2 [Susie.GilesKlein@atg.wa.gov](mailto:Susie.GilesKlein@atg.wa.gov)

3 Jennifer Hansen,  
PDC Compliance Officer,  
4 [jennifer.hansen@pdc.wa.gov](mailto:jennifer.hansen@pdc.wa.gov)

5  
6 **NOTICE: RECONSIDERATION**

7 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a Petition for  
8 Reconsideration with the PDC within ten (10) days from the date this Final Order is served upon  
9 you. Any Request for reconsideration must state the specific grounds for the relief requested.  
10 Petitions must be delivered or mailed to the Washington State Public Disclosure Commission,  
711 Capitol Way, Room 206, Box 40908, Olympia WA 98504-0908.

11 **NOTICE: PETITION FOR JUDICIAL REVIEW**

12 You have the right to appeal this Final Order to Superior Court, pursuant to the Petition for  
13 Judicial Review provisions of RCW 34.05.542. Any Petition for Judicial Review of this Final  
14 Order must be filed with the court and also served upon both the Commission and the Office of  
the Attorney general within thirty (30) days after the date this Final Order is served upon you.  
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# Final\_Order-Campbell-115649

Final Audit Report

2024-11-20

Created:	2024-11-20
By:	Jana Greer (jana.greer@PDC.WA.GOV)
Status:	Signed
Transaction ID:	CBJCHBCAABAAADqj3gkKoUurpVgLVw2dGbxFw3yv2tlPp

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-  Document created by Jana Greer (jana.greer@PDC.WA.GOV)  
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-  Document emailed to nancy.isslerlis@pdc.wa.gov for signature  
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-  Email viewed by nancy.isslerlis@pdc.wa.gov  
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-  Signer nancy.isslerlis@pdc.wa.gov entered name at signing as Nancy Isslerlis  
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