



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

July 1, 2019

Delivered electronically to Lori Larson, with 7th Legislative District Republicans

Subject: Complaints regarding the 7th Legislative District Republicans; PDC Case 27714

Dear Ms. Larson:

Below is a copy of an electronic letter sent to Walter Smith concerning the complaint he filed on behalf of his client, Karen Hardy, against the 7th Legislative District Republicans (Committee). As noted below in the electronic letter sent to Mr. Smith, the prohibitions found in RCW 42.17A.560 concerning soliciting and accepting contributions prior to and during a legislative session freeze period does not apply to a contributor or to a political party organization, such as the Committee.

The PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

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@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Kurt Young, Compliance Officer

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



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July 1, 2019

Delivered electronically to Walter Smith

Subject: Complaint filed against the 7th Legislative District Republican Party, PDC Case 27714

Dear Mr. Smith:

The Public Disclosure Commission (PDC) staff has completed its review of the complaint you filed on behalf of your client, Karen Hardy, against the 7th Legislative District Republican Party (Committee), a bona fide legislative district political party committee registered with the PDC. Your complaint alleged that the 7th Legislative District Republicans (Committee) may have violated RCW 42.17A.560 and its implementing rule, WAC 390-17-400, by making prohibited contributions during a legislative session freeze period.

PDC staff reviewed the allegations listed in the complaint, the statutes, rules and reporting requirements for political party committees, and the responses from Officers of the Committee. Based on staff's review, we found the following:

- RCW 42.17A.560 states that during the period 30 days prior to a regular legislative session convening and continuing through the until adjournment, "no state official or a person employed by or acting on behalf of a state official or state legislator may solicit or accept contributions to a public office fund, to a candidate or authorized committee, or to retire a campaign debt."
- Wes McCart, Chairman of the Committee stated in an October 27, 2017 letter to Tony Perkins with the Attorney General's Office, that the Committee payments were to purchase 4' x 8' campaign yard signs from the Committee to Elect Shelly Short and the Committee to Elect Jacquelin Maycumber (Short Campaign and Maycumber Campaign). He stated that the payments were not contributions to either the Short or Maycumber Campaigns, but instead were reported as a Miscellaneous Receipt on a C-3 reports filed by both candidates.
- Mr. McCart stated that one the candidate's campaigns contacted PDC staff and received an email from advising them that this type of activity should be disclosed by the recipient campaigns as "miscellaneous income."
- The Committee provided a copy of a May 3, 2017 email addressed to the PDC from Mitch Short, spouse of Shelly Short. The email questioned PDC staff as to whether a county political party committee could "purchase campaign signs" on behalf of the 2017 campaigns of Shelly Short and Jacquelin Maycumber while they are in special legislative session, and not violate the session freeze prohibitions against soliciting or accepting contributions.

- Mr. Short indicated that the Committee would provide the signs to its members at the party meetings and events, and to whomever requests one. He asked how would PDC staff advise the two campaigns to properly disclose and “categorize the payments received” from the Committee.
- On May 25, 2017, PDC staff responded to Mr. Short stating that the two campaigns would report the payments received from the Committee as a Miscellaneous Receipt on the C-3 report, with a description of the activity.

The prohibitions found in RCW 42.17A.560 concerning soliciting and accepting contributions prior to and during a legislative session freeze period does not apply to a contributor or to a political party organization, such as the Committee. The statute only applies to state officials who solicit or accept contributions during a legislative session freeze period.

Based on this information, the PDC has dismissed the allegations against the 7th Legislative District Republican Party in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, 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

cc: 7th Legislative District Republican Party

