



State of Washington

PUBLIC DISCLOSURE COMMISSION

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Public Disclosure Commission BAP Staff Memorandum

Ryan Luikens: PDC Case 149619

- On April 24, 2023, Ryan Luikens filed a Candidate Registration (C-1 report) with the Public Disclosure Commission (PDC), declaring his candidacy for the office of City Councilmember for the City of Camas, Ward No. 2, Position #1, selecting the Full Reporting Option for the 2023 election cycle, and listing himself as Treasurer.
- Mr. Luikens was a first-time candidate seeking public office in 2023. He was not elected to office to serve on the Camas City Council.
- Staff is alleging that Mr. Luikens violated RCW 42.17A.235 by failing to timely file the 7-Day Pre-General Election Summary Full Campaign Contribution and Expenditure Report (C-4 Report), as required for a 2023 candidate appearing on the November 7, 2023 general election ballot.
- For the 2023 election cycle, a 7-Day Pre-General Election C-4 report was required to be filed on October 31, 2023, covering the period October 17 through October 30, 2023
- The 2023 Friends to Elect Ry Luikens (Campaign), filed the 7-Day Pre-General Election C-4 report 20 days late on November 20, 2023, and 13 days after the November 7, 2023 general election had been held. The C-4 report disclosed \$10,797.29 in Campaign expenditures made for political advertisements that included a mailer, digital advertisements, political consulting, and a small candidate reimbursement for lost wages. The \$10,797.29 in late-reported Campaign expenditures, represented more than 65% of all Campaign expenditures made during the entire 2023 election cycle.
- As noted above, Mr. Luikens was a first-time candidate in 2023, and he has no prior violations of RCW 42.17A or WAC 390.
- On March 6, 2024, PDC staff sent an email to Mr. Luikens informing him that his Campaign disclosed expenditure information late and after the 2023 general election. The email communication went on to state that the level of late reported expenditure activity, and that issuing a warning letter to resolve the case was not sufficient. PDC staff informed Mr. Luikens that staff would be sending him a Statement of Understanding (SOU) shortly, for him to complete acknowledging a violation of RCW 42.17A.235 and pay a \$150 civil penalty as an alternative resolution to scheduling a Brief Adjudicative Proceeding (BAP).
- On March 7, 2024, PDC staff sent a follow-up email to Mr. Luikens, attached a PDF copy of the proposed SOU, and requesting it be completed and mailed back to the PDC along with the \$150 penalty payment no later than March 25, 2024.

- On March 7, 2024, Mr. Luikens promptly responded to staff's email concerning the proposed SOU stating that he acknowledged his mistake by missing the filing date his 7-Day Pre-General Election C-4 report. He stated that "as a first-time candidate, I have been on a steep learning curve and, regrettably, this important task was overlooked amidst the many challenges of running a campaign."
- Mr. Luikens indicated that "in light of current financial constraints, I respectfully request that your office consider a one-time waiving of the \$150 fine and instead issue a warning." In addition, he added that he was talking "this matter seriously," has learned from his oversight, and indicated he ensured "complete compliance in the event I were to ever run again."
- On March 7, 2024, after receiving the email from Mr. Luikens, staff responded that only the Commission had the authority to suspend a penalty, that this matter will be addressed at future BAP hearing, staff was withdrawing the SOU offer and would be sending him a BAP hearing notice sometime in April.

s/_____
Electronically Signed Kurt Young
PDC Compliance Officer

