



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

IN RE COMPLIANCE)
WITH RCW 42.17) Report of Investigation
)
Bill Littlejohn) PDC CASE NO: 14-013
)
Respondent)
_____)

I.
Background

- 1.1 Bill Littlejohn and his wife Esther Littlejohn own the following entities located in Sequim and Clallam County:
- A. Olympic Ambulance: 601 West Hendrickson Road, Sequim, WA 98382. Olympic Ambulance operates 25 ambulances daily and employs more than 200 emergency medical technicians, paramedics, nurses, and support staff providing ambulance service to five Western Washington counties.
 - B. Sherwood Assisted Living: 550 West Hendrickson Road, Sequim, WA 98382. Sherwood Assisted Living is an assisted living facility with 24 hour licensed nursing care and professionally trained aides for its residents.
 - C. Olympic Oxygen: 540 West Hendrickson Road, Sequim, WA 98382. Olympic Oxygen provides oxygen, and oxygen-related products to private homes and businesses such as doctors, dentists, and veterinarians on the Peninsula. Olympic Oxygen also operates its own oxygen filling plant.
- 1.2 On September 9, 2013, Citizens Against Fire District 2 Levy (CAFD 2 Levy), a political committee registered in opposition to Proposition 1, a fire district levy lid lift ballot proposition on the November 5, 2013 general election ballot, filed a Committee Registration (C-1pc report). CAFD 2 Levy was a first-time political committee operating under the Full Reporting Option. **Exhibit #1.** Proposition 1 was defeated 58% to 42%.
- 1.3 On October 15, 2013, Michael DeRousie filed a complaint alleging that CAFD 2 Levy had violated RCW 42.17A by accepting contributions from employees of companies owned by Bill Littlejohn, including Olympic Ambulance and Sherwood Assisted Living, that may have been reimbursed. The complaint alleged that Mr. Littlejohn may have reimbursed his employees for the contributions they made to CAFD 2 Levy, or that he

may have increased the employees' salaries or compensation with the intention that the increase be used to make a contribution in support of CAFD 2 Levy. **Exhibit #2.**

II.

Allegations & Summary of Investigative Findings

- 2.1 PDC staff found no evidence supporting that allegation that Mr. Littlejohn or any of the companies he owns (Olympic Ambulance, Sherwood Assisted Living, or Olympic Oxygen) reimbursed employees of those companies for contributions made to CAFD 2 Levy, or that he increased the salaries or compensation of his employees with the intention that the increase be used to make a contribution in support of CAFD 2 Levy.
- 2.2 However, staff found that the contributions attributed to seven of Mr. Littlejohn's employees, totaling \$7,500, were actually made by him, using his personal funds. The contributions were made in cash, and not by a written instrument containing the name of the actual donor (Bill Littlejohn) and the name of the payee (Citizens Against Fire District 2 Levy). He did this with the expressed purpose of not establishing a paper trail for the contributions. [Because each contribution was more than \$100, he was required by RCW 42.17A.475 to make the contributions by written instrument, containing the name of the donor and the name of the payee.]
- 2.3 CAFD 2 Levy reported Mr. Littlejohn's contributions on Cash Receipts Monetary Contributions reports (C-3 reports) filed on September 19 and September 27, 2013. The contributions included two \$1,250 contributions from Corrine Notar and Linda Mellott, and five \$1,000 contributions from Frank Beutler, Gail Rader, Todd McClain, Rena Keith, and John Schonig. Mr. Littlejohn eventually confirmed that he had provided the funds for the contributions.
- 2.4 Mr. Littlejohn said that in September 2013, he approached seven of his employees and asked if **"...he could make a contribution on their behalf to..."** CAFD 2 Levy. One employee said he was not asked to give his permission for Mr. Littlejohn to make a contribution in his name.
- 2.5 CAFD 2 Levy received a total of \$12,650 in monetary contributions and made expenditures totaling \$12,650. Mr. Littlejohn concealed the identity of the source of \$7,500 in contributions he made in the names of seven employees of companies he owns. The concealed contributions represented 59.3 percent of all contributions received and spent by CAFD 2 Levy.
- 2.6 No evidence was found that the officers of CAFD 2 Levy were aware that the money attributed to Mr. Littlejohn's employees was Mr. Littlejohn's money.
- 2.7 No evidence was found that the employees who agreed to allow Mr. Littlejohn to make a contribution to CAFD 2 Levy in their name were aware that the contribution was required to be attributed to Mr. Littlejohn, or that the contribution was required to be made by written instrument.

III. Findings

- 3.1 On September 19 and September 27, 2013, Mr. Littlejohn gave \$7,500 in cash to CAFD 2 Levy from personal funds he withdrew from Olympic Ambulance. He provided the committee with the names and addresses of seven of his employees, and told the committee that the contributions were from those employees. [Because each contribution was more than \$100, he was required by RCW 42.17A.475 to make the contributions by written instrument, containing the name of the donor and the name of the payee.]
- 3.2 On September 19, 2013, CAFD 2 Levy filed a C-3 report totaling \$7,000 that included \$2,500 in contributions reported as being from two employees of Mr. Littlejohn, as follows: **Exhibit #3**
- Corrine Notar: \$1,250 contribution; Bookkeeper, Olympic Ambulance.
 - Linda Mellott: \$1,250 contribution; Accountant, Sherwood Assisted Living.
- 3.3 On September 27, 2013, CAFD 2 Levy filed a C-3 report disclosing \$5,000 in contributions reported as being from employees of Mr. Littlejohn, as follows: **Exhibit #4**
- Frank Beutler: \$1,000 contribution; Service Technician, Olympic Oxygen.
 - Gail Reader: \$1,000 contribution; Billing Manager, Olympic Ambulance.
 - Todd McClain: \$1,000 contribution; Technician, Olympic Oxygen.
 - Rena Keith: \$1,000 contribution; Administrator, Olympic Ambulance.
 - John Schonig: \$1,000 contribution; Fleet Manager, Olympic Ambulance.
- 3.4 On January 3, 2014, Mr. Littlejohn provided a written response to the complaint filed by Mr. DeRousie. **Exhibit #5.** Mr. Littlejohn's January 3, 2014 response to staff's December 23, 2013 letter stated,
- “Please be advised this was an ugly campaign with an abundance of slanderous allegations by Mr. DeRousie and Mr. Phillips. The intent of the Levy was to replace the service of Olympic Ambulance with a Fire Department Taxpayer funded service. This would have adversely affected many of our employees who live in both Sequim and Port Angeles. No employees were reimbursed for contributions made to Citizens Against Fire District 2 Levy, and no employees received an increase in salary to fund a donation. I have a financial interest in both Olympic Ambulance and Sherwood Assisted Living.”**
- 3.5 Even though Mr. Littlejohn's response appeared to be an attempt to make it clear that the contributions were from the employees listed on the C-3 reports of CAFD 2 Levy, on January 31, 2014, staff sent a monetary contribution confirmation form to five contributors identified on C-3 reports as being employees of a business owned by Mr. Littlejohn (Gail Reader; Rena Keith; John Schonig; Corrine Notar; and Linda Mellott). Each employee was asked to certify (or declare) under penalty of perjury and the laws of

the State of Washington that the facts set forth in the confirmation statement concerning the contributions attributed to them were true and correct to the best of their knowledge.

- 3.6 On February 10, 2014, PDC staff received emails from Olympic Ambulance employees Rena Keith, John Schonig and Corrine Notar. **Exhibit #6.** The emails from Ms. Keith and Ms. Notar stated: **“In regards to the statement concerning contributions made to Citizens Against Fire District 2 Levy, a contribution was made on my behalf but was not from my personal funds.”** The email from Mr. Schonig contained a similar statement.
- 3.7 After receiving these responses, staff scheduled and conducted telephone interviews under oath with seven individuals, identified as contributors and employees of Mr. Littlejohn.

Bill Littlejohn provides additional written response to complaint

- 3.8 On March 13, 2014, John J. White Jr., an attorney with Livengood Alskog, submitted a letter on behalf of Mr. Littlejohn responding to the allegations listed in Mr. DeRousie’s complaint. **Exhibit #7.** Mr. White attached copies C-3 reports filed by CAFD 2 Levy, and stated the following:
- Mr. Littlejohn made contributions to CAFD 2 Levy committee in the names of other individual contributors.
 - Mr. Littlejohn approached a number of individuals, including employees of companies in which he has an ownership interest, in September of 2013 and asked them if **“...he could make a contribution on their behalf to...”** CAFD 2 Levy.
 - Mr. Littlejohn’s conversations with the individuals **“...took place over the course of about a week.”**
 - The names of the individuals (including addresses, employer and occupation information) and amounts of contributions that Mr. Littlejohn made on behalf of the individuals are listed on the C-3 reports attached to the response.
 - The contributions made by Mr. Littlejohn on behalf of the individuals **“...were made in cash, accompanied by a list showing the contributor information and amount.”**
 - **“The total contributions that Mr. Littlejohn made on behalf of the named individuals was \$7,500”**, and were all made using cash.
 - The cash was **“...contributed on two occasions, on or about September 19 and September 27, 2013...along with the information about the individuals on whose behalf the contribution was being made...”**
 - When the cash contributions were ready to be picked up by a representative of CAFD 2 Levy, Mr. Littlejohn had one of his staff persons at the front desk in his office **“...call the Committee to let them know that there was a contribution for the Committee”** to pick up.

- *“The list showing contributor information was the only communication provided to the Committee regarding the contributions.”*

Interviews of Employees of Olympic Ambulance; Sherwood Assisted Living; & Olympic Oxygen

Corrine Notar Interview

- 3.9 On February 10, 2014, Ms. Notar responded by email to staff’s January 31, 2014 confirmation letter. She confirmed that a contribution was made in her name to CAFD 2 Levy, but not with her money. On March 4, 2014, staff conducted a telephone interview under oath with Ms. Notar.
- 3.10 During the interview, Ms. Notar stated that she is a Bookkeeper for Olympic Ambulance and has worked for Mr. Littlejohn for 25 years. She confirmed that Mr. Littlejohn asked her if he could make a contribution in her name to CAFD 2 Levy sometime in September 2013. She said a specific amount was not discussed, but was told it would be approximately \$1,000. He also told her that her name might appear in the local newspaper as a contributor to the committee.
- 3.11 Ms. Notar said she believed it was proper for Mr. Littlejohn to make a contribution in her name, and thought at the time of their conversation that his proposal was similar to someone making a donation to a charitable organization in someone else’s name.
- 3.12 Ms. Notar said she was not aware of whether Mr. Littlejohn had approached other employees of Olympic Ambulance about making a contribution in their names, but she thought it was likely. She said she had no contact with the CAFD 2 Levy committee that received the money.
- 3.13 Ms. Notar said that a few years ago there was a ballot proposition in Mason County, and Mr. Littlejohn had been criticized by local fire district personnel for being the primary funder and spending a lot of money to defeat an annexation measure.
- 3.14 Ms. Notar concluded by stating that she has worked closely with Mr. Littlejohn for 26 years, and he has never asked her to do anything that was improper. She described him as a wonderful employer with high standards.

John Schonig Interview

- 3.15 On February 10, 2014, Mr. Schonig responded by email to staff’s January 31, 2014 confirmation letter. He confirmed that a contribution was made in his name to CAFD 2 Levy, but not with his money. On March 6, 2014, staff conducted a telephone interview under oath with Mr. Schonig.
- 3.16 Mr. Schonig stated that he has worked as the Fleet Manager for Olympic Ambulance for the last 10 years, and has worked for Mr. Littlejohn a total of 20 years. He said he did not contribute money to CAFD 2 Levy, and confirmed that the money attributed to him on C-3 reports was not his money, but was Mr. Littlejohn’s money.

- 3.17 He said that after reading a local newspaper article about the complaint against Mr. Littlejohn, he contacted Mr. Littlejohn and asked if he had used his name to make a contribution. He said Mr. Littlejohn told him he did not think he had made a contribution in his name. Mr. Schonig said Mr. Littlejohn did not ask him if he could make a contribution in his name to CAFD 2 Levy committee.
- 3.18 He said Mr. Littlejohn later apologized to him for using his name without asking for permission, and said he would take responsibility for his actions. Mr. Schonig said he believed Mr. Littlejohn had mistakenly included his name as a contributor.
- 3.19 Mr. Schonig said that Mr. Littlejohn does a great deal of good in the community, and believes he must have received bad advice about making contributions in the names of other people.

Linda Mellott Interview

- 3.20 On March 6, 2014, staff conducted a telephone interview under oath with Ms. Linda Mellott. Ms. Mellott stated that she has worked for Sherwood Assisted Living for 17 years in the accounting department. She said she was hired by Mr. Littlejohn and one other individual.
- 3.21 Ms. Mellott said she was having a conversation with Mr. Littlejohn about the upcoming fire district levy election, and offered to make a contribution to CAFD 2 Levy. She said Mr. Littlejohn told her it was not necessary for her to make a contribution because he wanted to make a contribution in her name, with his money.
- 3.22 She said Mr. Littlejohn told her the contribution would be between \$1,000 and \$1,250. She said he made a contribution in her name for \$1,250.
- 3.23 Ms. Mellott said she had no idea it was wrong for Mr. Littlejohn to provide the funds for a contribution using her name. She said she first became aware there was a problem when other Olympic Ambulance employees received their confirmation request letters from the PDC.
- 3.24 Ms. Mellott said she did not believe Mr. Littlejohn would do anything to hurt any of his employees. She stated that Mr. Littlejohn did not offer any incentive for allowing her name to be listed as a contributor, nor did he imply there would be any negative consequences if she did not allow him to use her name to make a contribution. She said she did not know why Mr. Littlejohn wanted to make contributions in the names of other people.

Rena Keith Interview

- 3.25 On February 10, 2014, Ms. Keith responded by email to staff's January 31, 2014 confirmation letter. She confirmed that a contribution was made in his name to CAFD 2 Levy, but not with his money. On March 6, 2014, staff conducted a telephone interview under oath with Mr. Schonig.

- 3.26 Ms. Keith stated that she has worked for Sherwood Assisted Living for 25 years as the Assisted Living Coordinator. She reports to Mr. Littlejohn. Ms. Keith stated that Mr. Littlejohn made a contribution in her name, using his funds, to CAFD 2 Levy committee.
- 3.27 She said Mr. Littlejohn came to her office and asked if she was aware of the Fire District levy. She said he sought permission to make a contribution to the committee in her name.
- 3.28 She said she thought Mr. Littlejohn's request was similar to someone asking a person for permission to make a charitable donation in their name. She said it never occurred to her that what Mr. Littlejohn was proposing might be wrong or improper.
- 3.29 She said Mr. Littlejohn made personal contributions to oppose a local fire district annexation measure in Mason County a few years ago.
- 3.30 She said that after the PDC sent out the confirmation letters, the employees who received the letters met with Mr. Littlejohn. She said she told him she could not sign the confirmation letter attesting that she had made the contribution attributed to her.
- 3.31 Ms. Keith said Mr. Littlejohn apologized to the employees, and said he did not want to get anyone in trouble, and would try to make it right. She said she had no contact with CAFD 2 Levy.
- 3.32 Ms. Keith said Mr. Littlejohn did not promise any reward for allowing her name to be used as a contributor, and did not state or imply that there would be any negative consequences if she did not agree to let her name be listed as a donor.
- 3.33 Ms. Keith said she is proud to work for Mr. Littlejohn, and believes he did not intend to do anything wrong.

Gail Reader Interview

- 3.34 Staff conducted a telephone interview under oath with Ms. Reader on March 6, 2014. Ms. Reader said she has worked for Olympic Ambulance Service for seven years, including six years as Billing Office Manager. She reports to Mr. Littlejohn.
- 3.35 Ms. Reader said Mr. Littlejohn made a \$1,000 contribution in her name, using his funds. She stated Mr. Littlejohn came to her office and asked if he could make a \$1,000 contribution in her name. She said she told him, "Sure." But could not recall the date this occurred. She said it happened when she was taking a deposit to the front desk in the office where she works.
- 3.36 Ms. Reader said she viewed the contribution as being similar to when someone makes a charitable contribution in someone else's name. She stated that she was aware from media reports of the fire district levy election before Mr. Littlejohn asked her if he could make a donation in her name.
- 3.37 She stated that she had no knowledge of the funds used by Mr. Littlejohn to make the contribution in her name, or whether it was in cash or by written instrument. She said Mr. Littlejohn did not offer any incentive or reward for allowing him to make a

contribution in her name, and said he did not threaten her if she did not allow him to make a contribution in her name. She did not recall Mr. Littlejohn apologizing after it was discovered that his contributions were improper. She stated that she did not know why Mr. Littlejohn asked to use her name as the source of a political contribution.

Todd McClain Interview

- 3.38 On April 8, 2014, staff conducted a telephone interview under oath with Todd McClain. Mr. McClain stated that he has worked for Olympic Oxygen for eight years, and said he was hired by John Schonig, the Fleet Manager for Olympic Ambulance. Mr. McClain said Olympic Oxygen has five employees.
- 3.39 Mr. McClain said Mr. Littlejohn approached him in September of 2013 and sought his permission to donate funds in his name to the CAFD 2 Levy. He said no other Olympic Oxygen, Olympic Ambulance or Sherwood Assisted Living employees were present when Mr. Littlejohn approached him.
- 3.40 He said Mr. Littlejohn did not initially discuss the amount of the contribution with him, but he later found out it would be approximately \$1,000. He said he did not think anything was wrong or illegal about Mr. Littlejohn making a contribution and attributing his name to it. He said Mr. Littlejohn apologized to him after the complaint was filed.
- 3.41 Mr. McClain said he had no contact with CAFD 2 Levy. He said he became aware that Mr. Littlejohn had made contributions in the names of several employees after PDC staff began contacting employees about the contributions.

Frank Beutler Interview

- 3.42 On April 9, 2014, staff conducted a telephone interview under oath with Frank Beutler. Mr. Beutler stated that he has worked for Olympic Oxygen for six years, and is supervised by Mr. McClain. He said he does not follow politics, is not a registered voter, and has never voted in an election. He said he knows the complainant, and lives within the boundaries of Fire District No. 2.
- 3.43 Mr. Beutler stated he was opposed to the levy lid lift, but has never made a political contribution. He said Mr. McClain contacted him while he was on duty about seeking his support to oppose the levy election. He said he initially thought he was being asked to allow his name to be listed as a person opposing the levy. Mr. Beutler stated that he did not know at the time that Mr. McClain was actually seeking permission for Mr. Littlejohn to use his name to make a campaign contribution to CAFD 2 Levy.
- 3.44 Mr. Beutler said he never spoke with Mr. Littlejohn about his name being used as a contributor before the complaint was filed. He said Mr. Littlejohn did not approach him or seek permission to donate funds in his name. He said after other Olympic Ambulance and Sherwood Assisted Living employees were contacted by PDC staff, Mr. Littlejohn addressed a group of employees and apologized for involving them in the campaign.

Interviews with Officers of Citizens Against Fire District 2 Levy

Dan Shotthafer Interview

- 3.45 On March 12, 2014, staff conducted a telephone interview under oath with Don Shotthafer. Mr. Shotthafer is the treasurer for CAFD 2 Levy. He said the fire district levy, if approved, would have been a significant tax increase for local taxpayers, which was the reason he decided to oppose it. He stated he and Eric Foth formed the committee in opposition to the 2013 levy in September of 2013. He said he has served on other political committees in the past, including serving as treasurer for candidates in past Clallam County Commissioner races.
- 3.46 Mr. Shotthafer stated that he did not discuss his plans to form an opposition committee with Mr. Littlejohn. He said he has had no prior interactions with Mr. Littlejohn. He said Mr. Littlejohn played no role in making decisions for CAFD 2 Levy.
- 3.47 He said Mr. Littlejohn gave a group of contributions to Eric Foth, another committee member. He said Mr. Foth picked up the money from one of Mr. Littlejohn's businesses. He said Mr. Foth likely deposited the contributions, and then gave him the contributor information.
- 3.48 Mr. Shotthafer said the contributions from Mr. Littlejohn were in the form cash, and included the names and addresses of each contributor, along with the relevant employer and occupation information for each contributor. He said the committee received contributions from Mr. Littlejohn on two occasions in September 2013. He said he did not speak with Mr. Littlejohn about the contributions he provided.
- 3.49 Mr. Shotthafer said he had no reason to believe the money he picked up came from Mr. Littlejohn rather than from the people identified by Mr. Littlejohn.

Eric Foth Interview

- 3.50 On March 12, 2014, staff conducted a telephone interview under oath with Eric Foth. Mr. Foth served as the Campaign Manager/Media Contact for CAFD 2 Levy. Mr. Foth said he and Mr. Shotthafer formed CAFD 2 Levy. He said he heard about large buyouts of fire district employee leave balances, and then heard about the levy, and decided to talk with Mr. Shotthafer about forming a committee to oppose the levy. Mr. Foth said he has previously served as a committee officer for candidates, but not for a ballot measure committee. He said Mr. Littlejohn had no role in forming or directing the activities of CAFD 2 Levy, and did not approach the committee about making a contribution.
- 3.51 Mr. Foth said he attended a meeting in late August or early September 2013 with Olympic Ambulance, one of Mr. Littlejohn's businesses, to gather statistical information from the ambulance business so they would be better informed about the levy issues. He said he also had a survey from the fire district's website about ambulance service that they discussed with Olympic Ambulance.
- 3.52 Mr. Foth said that at the meeting, Mr. Littlejohn, or a representative of Olympic Ambulance, asked if the committee could accept contributions, and he assured them that the committee could accept contributions. Mr. Foth stated that sometime later, he

received a call from someone who he believed to be an employee of one of Mr. Littlejohn's businesses, informing him that they had some contributions ready to be picked up. Mr. Foth said he dropped off committee signs at the same time he picked up the contributions.

- 3.53 Mr. Foth stated the contributions were in envelopes at the front desk of the business, and that each contribution was in a separate envelope with the contributor's information written on the envelope. He said the contributions were in cash, and that he gave the contributor information to Mr. Shottthafer.
- 3.54 Mr. Foth said he picked up contributions from Olympic Ambulance on two or three occasions. He said that receiving contributions in cash did not raise any concerns for him because he has received cash contributions in the past.

Interview with Bill Littlejohn

- 3.55 On June 5, 2014, PDC staff conducted an in-person interview under oath at the PDC offices in Olympia with Mr. Littlejohn. **Exhibit #8 – excerpts from Bill Littlejohn Interview.** Mr. Littlejohn was represented at the interview by Mr. White.
- 3.56 Mr. Littlejohn said he has been in the ambulance business for many years. He said he provided the only ambulance service in the Port Angeles and Sequim areas for many years, including in the rural areas on the Olympic Peninsula. He said Olympic Ambulance provided some of the first ambulance, EMT and first responder services in the area. He said this was before fire districts began providing these services. He stated that he has worked closely with several fire districts in the past.
- 3.57 Mr. Littlejohn said he made several large contributions in 2010 to oppose a Mason County Fire District annexation ballot measure that would have merged Mason County Fire District No. 5 with the City of Shelton. He said his involvement in the 2010 election resulted in what he described as "*fall-out for Olympic Ambulance for taking on the fire district and firefighters brotherhood.*" He said he made contributions in 2010 in his name, using his own funds. He said that if the 2010 ballot measure had been approved, it would have reduced the service area for Olympic Ambulance.
- 3.58 Mr. Littlejohn said his experience in 2010 when he opposed a local ballot measure, influenced how he made contributions in 2013. Mr. Littlejohn said he did not think there was a problem in making the contributions with his personal funds and attributing the contributions to his employees.
- 3.59 Mr. Littlejohn stated that he approached some of his employees about making contributions to CAFD 2 Levy, and asked if they had a problem with him making a contribution in their name. He said he approached employees he was close to and knew well. Mr. Littlejohn said none of the employees he spoke with expressed reservations about him making contributions in their name.
- 3.60 Mr. Littlejohn said the 2013 fire district levy lid lift ballot measure was a threat to Olympic Ambulance and his employees. He said he made the contributions in the name

of his employees rather than in his own name, because he was trying to maintain a “*low profile*” during the election.

- 3.61 He said he took a personal draw from one of his businesses to make the contributions. He acknowledged making the contributions with cash to avoid leaving a paper trail. He said he left an envelope containing the contributions with a staff person at the front desk of his office, for Eric Foth, an officer of CAFD 2 Levy. He said he provided contributions to the committee on two occasions. He said no one from the committee questioned him about the contributions. Mr. Littlejohn said he was the only person involved in making the decision to make contributions in the names of his employees.
- 3.62 Staff asked Mr. Littlejohn why he stated in his January 3, 2014 initial response to the complaint that “*No employees were reimbursed for contributions made to Citizens Against Fire District 2 Levy, and no employees received an increase in salary to fund a donation...*” when he knew that his employees had not made contributions to the levy committee with their own personal funds. Mr. Littlejohn stated that PDC staff asked a specific question in its December 23, 2013 letter, and he answered it.

IV. Scope

4.1 PDC staff reviewed the following documents:

- October 15, 2013, complaint filed by Michael DeRousie against CAFD 2 Levy committee.
- PDC C-1pc, C-3, and C-4 reports filed by CAFD 2 Levy.
- Queries of the PDC contribution database concerning Bill Littlejohn and individuals interviewed during the course of this investigation.
- March 13, 2014, response letter from John J. White Jr., an attorney with Livengood Alskog, on behalf of Bill Littlejohn.

4.2 PDC conducted the following interviews:

- Telephone interview with Corrine Notar on March 4, 2014;
- Telephone interview with Gail Reader on March 6, 2014;
- Telephone interview with Rena Keith on March 6, 2014;
- Telephone interview with Linda Mellott on March 6, 2014;
- Telephone interview with John Schonig on March 6, 2014;
- Telephone interview with Eric Foth on March 12, 2014;
- Telephone interview with Dan Shothafer on March 12, 2014;
- Telephone interview with Todd McClain on April 8, 2014.
- Telephone interview with Frank Beutler on April 9, 2014.
- In-person interview with Bill Littlejohn on June 5, 2014, at PDC offices in Olympia, Washington. Mr. Littlejohn was represented by John J. White, Jr.

V.
Laws and Rules

5.1 **RCW 42.17A.435** states the following concerning the identification of contributions:

“No contribution shall be made and no expenditure shall be incurred, directly or indirectly, in a fictitious name, anonymously, or by one person through an agent, relative, or other person in such a manner as to conceal the identity of the source of the contribution or in any other manner so as to effect concealment.”

5.2 **RCW 42.17A.475** requires certain contributions to be made by written instrument as follows:

“(1) A person may not make a contribution of more than *eighty dollars, other than an in-kind contribution, except by a written instrument containing the name of the donor and the name of the payee.” *Eighty dollars has been changed by rule to one hundred dollars.

Respectfully submitted this 1st day of July, 2014.



Kurt Young
PDC Compliance Officer

List of Exhibits

- Exhibit #1** September 9, 2013, Committee Registration (C-1pc report) filed by Citizens Against Fire District 2 Levy (CAFD 2 Levy).
- Exhibit #2** October 15, 2013, complaint filed by Michael DeRousie against CAFD 2 Levy.
- Exhibit #3** September 19, 2013, CAFD 2 Levy C-3 Report
- Exhibit #4** September 27, 2013, CAFD 2 Levy C-3 Report
- Exhibit #5** January 3, 2014, response letter from Bill Littlejohn.
- Exhibit #6** February 10, 2014, emails received by PDC staff from Olympic Ambulance employees Rena Keith, John Schonig and Corrine Notar.
- Exhibit #7** March 13, 2014, response letter from John J. White Jr., an attorney with Livengood Alskog submitted on behalf of Bill Littlejohn.
- Exhibit #8** Excerpts from the June 5, 2014 Bill Littlejohn Interview.