



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 31, 2018

Delivered electronically to Carolyn Eslick at “a4book@gmail.com”

Subject: Complaint filed by Jordan Sears, PDC Case 41628

Dear Representative Carolyn Eslick:

Below is a copy of an electronic letter sent to Jordan Sears concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Jordan Sears, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your acceptance of over-limit anonymous contributions as noted in the attached letter sent to Jordan Sears. Staff expects you to maintain complete records of all fund-raising activities, including any itemized individual contribution details required by law, to ensure timely and accurate disclosure on C-3 and C-4 reports in future years as a candidate for public office. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by email at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 31, 2018

Delivered electronically to Jordan Sears at “samantha@senatedemocrats.org”

Subject: Complaint regarding Carolyn Eslick, PDC Case 41628

Dear Jordan Sears:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 4, 2018. Your complaint alleged that Representative Carolyn Eslick may have violated RCW 42.17A.220 for accepting over-limit anonymous contributions during election 2014 and election year 2018.

PDC staff reviewed the applicable statutes, rules, and reporting requirements; the response provided by Representative Eslick; and the applicable PDC reports filed by Respondent to determine if your allegations support a finding of one or more violations.

Based on staff’s review, we found the following:

- Carolyn Eslick is a current Representative in Legislative District 39 after being appointed to the position in 2017 and successfully elected in the 2018 general election. Ms. Eslick was a candidate for Snohomish County Executive in the 2014 election and lost in the general election.
- On October 24, 2017, Ms. Eslick, filed a C-1 declaring candidacy for State Representative in Legislative District 39 and on March 10, 2014, Carolyn Eslick, filed a C-1 report declaring candidacy for Snohomish County Executive. Although Ms. Eslick has prior experience as a candidate and elected official, this was her first time filing under the “Full Reporting” option.
- In her response, Representative Eslick acknowledged the campaign’s failure to itemize individual donations and report them as anonymous instead. She stated that the funds were proceeds from several raffles and that at no time was there an attempt to hide contributions from the public, rather, there was a misunderstanding of how to report these contributions.

- The 2018 State Representative Campaign originally disclosed \$1,425 dollars in anonymous contributions and submitted amended reports that itemized all but \$207 in un-identified funds to bring the aggregate total of anonymous contributions to less than \$300 dollars as required by law.
- The 2014 Snohomish County Executive Campaign originally disclosed \$2,200 in anonymous contributions and has identified all but \$345 in un-identified funds. The 2014 campaign experienced technical difficulties with ORCA when attempting to electronically amend reports to disclose the itemized donations but has provided a list of individual donations for public review and is working with PDC staff to file the required C-3 reports electronically. In addition, the campaign has issued a \$45-dollar check to the state for the remainder of the over limit anonymous contribution aggregate total reducing the amount to \$300 dollars as required by law.

Although the 2014 Snohomish County Executive Campaign and the 2018 State Representative Campaign originally submitted C-3 reports that included anonymous contributions in excess of the \$300 or one percent of the total contributions, the source of the previously unidentified contributions have now been disclosed and the majority of the remaining campaign contributions were reported in a timely manner.

Based on these findings staff has determined that, in this instance, failure to timely and accurately disclose individual donations received at fund-raising events in 2014 and 2018, does not amount to an actual violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), however, Carolyn Eslick will receive a formal written warning concerning acceptance of over-limit anonymous contributions. The formal written warning will include staff's expectation that Carolyn Eslick maintain complete records of all fund-raising activities, including any itemized individual contribution details required by law, to ensure timely and accurate disclosure on C-3 and C-4 reports in future years as a candidate for public office. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____
Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Carolyn Eslick