



STATE OF WASHINGTON  
PUBLIC DISCLOSURE COMMISSION

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Toll Free 1-877-601-2828 • E-mail: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)

October 17, 2016

[electdaveneupert@gmail.com](mailto:electdaveneupert@gmail.com)

Subject: PDC case 8796

Dear Ms. Hernandez

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 12, 2016. Your complaint alleged that Brian Coughenour, candidate for Superior Court Judge in Clallam County, may have violated RCW 42.17A.235 and .240 by failing to report campaign expense (C4 report) activity.

PDC staff reviewed your allegations, and as a result of staff's initial review, we found the following:

- When notified of the complaint the Coughenour campaign filed the missing C4 reports. They are a first time campaign and encountered system difficulties with the ORCA filing software.
- The missing C4 reports are filed and meet PDC filing requirements.
- Brian Coughenour has no previous violations of PDC laws and rules.

Based on these initial findings, I have determined that failure to file the C4 reports due to system difficulties does not amount to a material violation warranting further investigation under these circumstances.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further action in this case.

If you have questions, you may contact Jacob Berkey, toll-free at 1-877-601-2828, or by e-mail at [Jacob.berkey@pdc.wa.gov](mailto:Jacob.berkey@pdc.wa.gov).

Sincerely,

  
Jacob Berkey  
PDC Compliance Staff

Endorsed by,

  
Evelyn Fielding Lopez  
Executive Director

cc: Brian Coughenour campaign