



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.pdca.wa.gov

May 3, 2018

Delivered electronically to Julie Door

Subject: Julie Door Complaint Return Cover Letter, PDC Case 33659

Ms. Door:

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

As noted below in the electronic letter to Mr. Churchman, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

If you have questions, please contact PDC staff member Kurt Young by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

/s _____
Kurt Young
Compliance Officer

Endorsed by,

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



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May 3, 2018

Delivered electronically to Dave Churchman

Subject: Complaint filed against Julie Door, PDC Case 33659

Mr. Churchman:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 4, 2018. Your complaint alleged that Julie Door, a candidate seeking the office of State Representative in the 25th Legislative District in 2018, may have violated RCW 42.17A.205 by listing an address on the Candidate Registration (C-1 report) for the public inspection period of the campaign “books of account” that is outside of the Puyallup area.

PDC staff reviewed the allegations listed in your complaint, the statutes and rules, and the response from the Friends of Julie Door campaign, and as a result we found the following:

- RCW 42.17A.205(1)(i) states “The street address of the place and the hours during which the committee will make available for public inspection its books of account and all reports filed in accordance with RCW42.17A.235.
- RCW 42.17A.235(4) and (5) states in part, the following: “As specified in the committee's statement of organization filed under RCW 42.17A.205, the books of account must be open for public inspection by appointment at the designated place for inspections...” (5) “Copies of all reports filed pursuant to this section shall be readily available for public inspection by appointment, pursuant to subsection (4) of this section, at the principal headquarters or, if there is no headquarters, at the address of the treasurer or such other place as may be authorized by the commission.”
- On March 12, 2018, Julie Door filed a C-1 report declaring her candidacy for State Representative in the 25th Legislative District in 2018, and selecting the full reporting option. Ms. Door is an incumbent Puyallup City Council member since being elected to that office in 2013, and was re-elected to that office in 2017.
- The C-1 report listed Jason Bennett as the Campaign Treasurer, Argo Strategies as the Campaign Consultant, and provided a Seattle street address for Argo Strategies in section #10 of the report to inspect the campaign “books of account.”

- Mr. Bennett stated that the PDC laws and rules, and instructions on the PDC website, do not require the campaign to have the records of books of accounts available for public inspection in the City of Puyallup.

While the “out of area” information is listed in section #10 of the C-1 report, that specific requirement is not codified in any PDC statute or has not been adopted by the Commission in any rule, and is therefore not required. Based on these findings, staff has determined that in this instance, there is no evidence that supports a finding of a material violation warranting further investigation.

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

If you have questions, you may contact Kurt Young by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

/s _____
Kurt Young, Compliance Officer

Endorsed by,

/s _____
Barbara Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Julie Door

