



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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

September 14, 2018

Delivered electronically to Randall Gaylord at “[rgaylord@rockisland.com](mailto:rgaylord@rockisland.com)”

Subject: Randall Gaylord Complaint Return with Cover Letter, PDC Case #36572

Mr. Gaylord:

Below is a copy of an electronic letter sent to Glen Morgan concerning the complaint he filed with the Public Disclosure Commission (PDC) against your 2018 re-election Campaign for San Juan County Prosecutor. As noted below in the electronic letter to Mr. Morgan, the PDC will not be conducting a more formal investigation into the allegations listed in the complaint he filed against you.

Based on this information, the PDC has resolved this matter as a complaint return with no evidence of violations, since you took immediate corrective action in amending the C-4 report. The PDC has closed this matter.

If you have questions, please contact PDC staff member Kurt Young by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by,

/s \_\_\_\_\_  
Kurt Young, Compliance Officer

/s \_\_\_\_\_  
Barbara Sandahl, Deputy Director  
For Peter Lavalley, Executive Director



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September 14, 2018

Sent electronically to Glen Morgan at "glen@wethegoverned.com"

Subject: Complaint filed against Randall Gaylord, PDC Case #36572

Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 5, 2018, against Randall Gaylord, the incumbent San Juan County Prosecutor and a candidate seeking re-election to that office in 2018. The complaint alleged that Mr. Gaylord may have violated RCW 42.17A.240 by failing to properly breakdown expenditures listed on the Summary Full Campaign Contributions and Expenditures report (C-4 report), including the details of the services or goods provided.

PDC staff reviewed the allegations listed in the complaint you filed, the statutes, rules and reporting requirements, the C-4 reports filed by the Re-elect Gaylord Prosecutor Committee, and the response from Mr. Gaylord to the allegations listed in the complaint. As a result, we found the following:

- Randall Gaylord is the incumbent San Juan County Prosecutor dating back to at least 1995 according to PDC records.
- Mr. Gaylord filed a Candidate Registration (C-1 report) on February 20, 2018, declaring his candidacy for re-election to the office of San Juan County Prosecutor, and initially selecting the Mini Reporting option. Mr. Gaylord filed an amended C-1 report on May 28, 2018, requesting approval from the PDC to change to the Full Reporting option, and his request to change options was approved on June 6, 2018.
- On June 1, 2018, the Re-elect Gaylord Prosecutor Committee (Campaign) filed the May 2018 C-4 report disclosing no contributions were received, and \$2,542 in expenditures made. The initial May 2018 C-4 report was filed nine days before the June 10, 2018, due date disclosing two expenditures that included \$1,542 to the San Juan County Treasurer for the candidate filing fee, and \$1,000 to TIF and GIF Creative, LLC for "website and social media services."
- Mr. Gaylord stated the complaint requested an itemization for expenditures that were "incurred by a vendor, Tif and Gif, for website registration with Godaddy.com.

- Mr. Gaylord stated that his research indicated this issue was addressed in response to a PDC complaint (and a Citizen Action Notice) filed by you against Kristine Lytton. He cited an April 10, 2017 letter from Linda Dalton, Assistant Attorney General with the Campaign Finance Unit, in which she is quoted as saying: *“the allegation that Rep. Lytton was required to breakdown sub-vendor information for the expenditure to Blue Utopia for domain renewal is not supported by the law.”*
- Mr. Gaylord stated that rather than waiting for the PDC to resolve this matter, he requested TIF and GIF Creative, LLC provide him with a more detailed accounting or invoice for the services provided to his Campaign. He stated that TIF and GIF Creative, LLC promptly provided his campaign with that information, and he filed an amended May 2018 C-4 report on June 6, 2018, disclosing the details of the services provided to his Campaign for the \$1,000 expenditure.
- The amended May 2018 C-4 report disclosed five separate expenditure made to TIF and GIF Creative, LLC on May 23, 2018, that included \$957 for Deposit – social media, website, design logo & other services; two \$15 expenditures to Godaddy.com for 1-year domain registration for two names; and \$10 for one-month website hosting fees.
- Mr. Gaylord stated that he promptly amended the C-4 report on the day after the complaint was filed, provided “every detail requested by Mr. Morgan is shown before the filing deadline. I appreciate the filer assistance available at the PDC for the use of the ORCA software, and the explanations and options available to itemize charges by the same vendor.”

Mr. Gaylord took immediate corrective action and filed an amended C-4 report for May of 2018 as soon as he became aware of the allegations in the complaint. In addition, the amended C-4 report was filed four days prior to the required due date of June 10, 2018, and therefore did not impact the public.

Based on these findings, there is no evidence of a violation, and the PDC will not be conducting a more formal investigation into your complaint or pursuing further enforcement action. The PDC has closed this case. If you have questions, you may contact Kurt Young by e-mail at [kurt.young@pdc.wa.gov](mailto:kurt.young@pdc.wa.gov).

Sincerely,

Endorsed by:

/s \_\_\_\_\_  
Kurt Young  
PDC Compliance Officer

/s \_\_\_\_\_  
Barbara Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Randall Gaylord