



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

TO: Commissioners

FROM: Kurt Young, PDC Compliance Officer *KY*

DATE: July 2, 2014

SUBJECT: Bill Littlejohn, PDC Case No. 14-013

This case involves allegations that Bill Littlejohn violated:

- RCW 42.17A.435 by concealing the identity of the true source of \$7,500 in cash contributions he made in the name of seven employees of companies in which he has an ownership interest to Citizens Against Fire District 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; and
- RCW 42.17A.475 by failing to make seven contributions of more than \$100 each, totaling \$7,500, by a written instrument containing the name of the donor and the name of the payee, to Citizens Against Fire District 2 Levy.

Staff is working with the Respondent to present a Stipulation of Facts, Violations and Penalty for your consideration.

c: Linda Dalton, Senior Assistant Attorney General
John J. White, Counsel for Mr. Littlejohn



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BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

In the Matter of Enforcement Action
Against:

Bill Littlejohn

Respondent.

PDC Case No. 14-013

Notice of Administrative Charges

IT IS ALLEGED as follows:

I. Jurisdiction

1. The Public Disclosure Commission (PDC) has jurisdiction over this proceeding pursuant to Chapter 42.17A RCW, the Public Disclosure Act; Chapter 34.05 RCW, the Administrative Procedure Act; and Title 390 WAC. These charges incorporate the Report of Investigation and all related exhibits by reference.

II. Allegations

2. Staff alleges that Respondent Bill Littlejohn violated provisions of the state campaign finance disclosure laws during 2013, as follows:
 - A. RCW 42.17A.435: By concealing the identity of the true source of \$7,500 in cash contributions he made in the name of seven employees of companies in which he holds an ownership interest to Citizens Against Fire District 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; and
 - B. RCW 42.17A.475: By failing to make seven contributions of more than \$100 each, totaling \$7,500, by a written instrument containing the name of the donor and the name of the payee, to Citizens Against Fire District 2 Levy.

III. Background & Facts

3. Bill Littlejohn has an ownership interest in the following businesses located in the City of Sequim, and in Clallam County: Olympic Ambulance; Sherwood Assisted Living; and Olympic Oxygen. These businesses provide ambulance, EMT, first responder, and related services on the Olympic Peninsula.
4. On September 9, 2013, Citizens Against Fire District 2 Levy (CAFD 2 Levy) registered as a political committee in opposition to Proposition 1, a fire district levy lid lift ballot proposition on the November 5, 2013 general election ballot. The ballot proposition failed. Had it passed, some of Mr. Littlejohn's businesses would have been negatively affected.
5. On September 19 and September 27, 2013, Mr. Littlejohn made seven cash contributions totaling \$7,500 to CAFD 2 Levy in opposition to Proposition 1. He made these contributions using the names of seven of his employees by placing the cash in envelopes and putting the employee's name and contact information on the front of the envelope. He then had his staff contact the committee to let it know that there were contributions to pick up at the business. He did this with the expressed purpose of not establishing a paper trail for the contributions.
6. Mr. Littlejohn sought and received permission from six of the seven employees to make a contribution in their name with his money. The six employees stated that they gave Mr. Littlejohn permission, not realizing that there is a prohibition against making a contribution in name of another person. According to the seventh employee, Mr. Littlejohn did not ask for permission to make a contribution in his name.
7. The contributions were made in cash, and not by a written instrument containing the name of the donor (Bill Littlejohn) and the name of the payee (Citizens Against Fire District 2 Levy).
8. CAFD 2 Levy reported seven contributions from Mr. Littlejohn's employees, on September 19 and September 27, 2013, as follows:
 - 1) Corrine Notar: \$1,250 contribution; Bookkeeper, Olympic Ambulance (September 19, 2013);
 - 2) Linda Mellott: \$1,250 contribution; Accountant, Sherwood Assisted Living (September 19, 2013);

- 3) Frank Beutler: \$1,000 contribution; Service Technician, Olympic Oxygen (September 27, 2013);
 - 4) Gail Reader: \$1,000 contribution; Billing Manager, Olympic Ambulance (September 27, 2013);
 - 5) Todd McClain: \$1,000 contribution; Technician, Olympic Oxygen (September 27, 2013);
 - 6) Rena Keith: \$1,000 contribution; Administrator, Olympic Ambulance (September 27, 2013); and
 - 7) John Schonig: \$1,000 contribution; Fleet Manager, Olympic Ambulance (September 27, 2013).
9. The seven individuals listed above are employees of Mr. Littlejohn, and all confirmed that they did not make a contribution to CAFD 2 Levy with their own funds.
10. Mr. Littlejohn said he made the contributions in this manner because he wanted to keep a low profile during this election. Mr. Littlejohn had experienced a prior adverse reaction when he made contributions to oppose a 2010 ballot proposition in Mason County, a proposition that would have also negatively affected his businesses.

IV. Law and Rules

RCW 42.17A.435 states that no contribution shall be made in a fictitious name, by one person through an agent, relative, or other person, or anonymously, 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.

RCW 42.17A.475 requires certain contributions to be made by written instrument and states: “(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.” *By rule, the eight dollar threshold has been increased to one hundred dollars.

Respectfully Submitted this 1st day of July, 2014.


Philip E. Stutzman
Director of Compliance



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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.

 PUBLIC DISCLOSURE COMMISSION 711 CAPITOL WAY RM 206 PO BOX 40908 OLYMPIA WA 98504-0908 (360) 783-1111 Toll Free 1-877-601-2828		Political Committee Registration	C1_(1/12)PC	DATE FILED PDC SEP - 9 2013
Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.) Citizens Against Fire District 2 Levy		Acronym:		Telephone: (360 460 1988)
Mailing Address P. O. Box 1481		Fax: ()		E-mail: stopoutrageousfiredist2levy@g mail.com
City Port Angeles	County Clallam	Zip + 4 98362		E-mail: stopoutrageousfiredist2levy@g mail.com
NEW OR AMENDED REGISTRATION? <input checked="" type="checkbox"/> NEW. Complete entire form. <input type="checkbox"/> AMENDS previous report. Complete entire form.		COMMITTEE STATUS <input type="checkbox"/> Continuing (On-going; not established in anticipation of any particular campaign election.) <input checked="" type="checkbox"/> 2013 election year only. Date of general or special election: <u>11/05/2013</u> (Year)		
1. What is the purpose or description of the committee? <input type="checkbox"/> Bona Fide Political Party Committee - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.				
<input checked="" type="checkbox"/> Ballot Committee - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure:			Ballot Number Prop 1	FOR <input type="checkbox"/> AGAINST <input checked="" type="checkbox"/>
<input type="checkbox"/> Other Political Committee - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name:				
For single election-year only committees (not continuing committees): Is the committee supporting or opposing (a) one or more candidates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, attach a list of each candidate's name, office sought and political party affiliation. (b) the entire ticket of a political party? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, identify the party:				
2. Related or affiliated committees. List name, address and relationship. <input type="checkbox"/> Continued on attached sheet.				
3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.) If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options. <input type="checkbox"/> MINI REPORTING Mini Reporting is selected. No more than \$5,000 will be raised or spent <u>and</u> no more than \$500 in the aggregate will be accepted from any one contributor.				
<input checked="" type="checkbox"/> FULL REPORTING Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.				
4. Campaign Manager's or Media Contact's Name and Address Eric Foth 1354 Henry Boyd Rd, Port Angeles, WA 98362		Telephone Number: (360) 477-1171		
5. Treasurer's Name and Address. Does treasurer perform <u>only</u> ministerial functions? Yes ___ No <input checked="" type="checkbox"/>. See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet. <input type="checkbox"/> Continued on attached sheet.		Daytime Telephone Number: (360-460-1988)		
6. Persons who perform only ministerial functions on behalf of this committee <u>and</u> on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details. <input type="checkbox"/> Continued on attached sheet.				
7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer." <input type="checkbox"/> Continued on attached sheet.				
8. Campaign Bank or Depository First Federal		Branch East Side	City Port Angeles	
9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address. Street Address, Room Number, City where campaign books will be available for inspection 214 Alderview Dr, Port Angeles, WA 98362 In order to make an appointment, contact the campaign at (telephone, fax, e-mail): (360-460-1988)				
10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters. <input type="checkbox"/> A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.			11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge. Committee Treasurer's Signature Date  9/7/2013	

Office Use Only: No. _____

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OCT 16 2013

Public Disclosure Commission



**WASHINGTON STATE PUBLIC DISCLOSURE COMMISSION
COMPLAINT FORM**

(See instructions on the last page.)

Description of Complaint

1. RESPONDENT:

Identify who you are filing a complaint against and provide all contact information you have for them. Give names and titles, if any, for individuals, and the full name of any organization. Please note that the PDC does not enforce federal campaign finance laws or local ordinances.

Example #1: Joe Public, Mayor of My Town,

123 Main Street, Your Town, State, Phone: 555-123-4567, Email: unknown

Example #2: The Political Action Group (instead of P.A.G.), 123 Main Street, Your Town, State,

Phone: 555-123-4567, Email: pag@pag.org

Citizen's against Fire District 2 levy, Mr. Eric Foth Chairperson, telephone 360-460- 1988, PO Box 1481 Port Angeles, WA 9836

2. ALLEGED VIOLATIONS:

Explain how and when you believe the people/entities you are filing a complaint against violated RCW 42.17/RCW 42.17A or Title 390 WAC. Be as detailed as possible about dates, times, places and acts. If you can, cite which specific laws or rules you believe were violated. Attach additional pages if needed. (Note that the RCW 42.17 citation applies to conduct before 2012 and the RCW 42.17A citation applies to conduct on or after January 1, 2012.)

The PDC filings of forms C3 clearly indicate a pattern of "book keepers" for companies owned by Bill Littlejohn (Olympic Ambulance) and his retirement home in Sequim "Sherwood Assisted Living" along with employees Olympic Ambulance, Olympic Oxygen service technicians, Fleet Managers with Olympic Ambulance, billing Manager with Olympic Ambulance, Administrators with Olympic Ambulance all donating from \$1,000 to \$1,250 to this campaign, It is HIGHLY SUSPECT that these individuals did this out of their concern for a levy in another city! This is clearly a violation of RCW42.17A.485 a person may not, directly or indirectly, reimburse another person for a contribution to a candidate for public office, political committee, or political party. In addition, RCW 42.17A.495 (1) No employer or labor organization may increase the salary of an officer or employee, or compensate an officer, employee, or other person or entity, with the intention that the increase in salary, or the compensation, or a part of it, be contributed or spent to support or oppose a candidate, state official against whom recall charges have been filed, political party, or political committee.

Evidence and Witnesses

3. EVIDENCE:

List the documents or other evidence you have that support your complaint, if any, and attach copies to this form. If you do not have copies, provide any information you have about where you believe the documents or evidence can be found and how to obtain it. Attach additional pages if needed.

Example: Emails between Joe public and Candidate X, attached OR

Joe Public has emails from Candidate X which describe an illegal campaign donation, and Joe Public's phone number is 555-123-4567.

PDC Registration form C1pc September 9th, 2013 Citizens Against Fire District 2 Levy PO Box 1481, Port Angeles, WA 98362 plus Form C3 filed 09-19-13 plus form C3 filed 09-20-13 plus form C3 filed 09-27-13 (copies attached)

4. WITNESSES:

List the names and contact information, if known, of any witnesses or other persons who have knowledge of facts that support your complaint. Attach additional pages if needed.

Example: Jane Public was present when Candidate X spoke to me about the illegal contribution. Jane Public's address is 123 Main Street, Your Town, USA 12345, and her phone number is 555-123-4567.

Sam Phillips PO Box 1384 Port Angeles, WA 98362 360-406-0429

Certification

In signing this complaint:

- I have provided all information, documents and other evidence of which I am aware;
- If I become aware of additional information, documents or evidence related to my complaint, I will promptly provide it to the PDC; and,
- I am providing the PDC current information on how to contact me, and will promptly update that information if it changes.

Your name (print or type) Michael DeRousie

Street address 1946 Westview Drive

City, state and zip code Port Angeles WA 98363

Telephone number (including area code) 360-452-3462

E-mail address (optional)
miked@spashop.com

Oath

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Public Disclosure Commission

Required for complaints against elected officials or candidates for elective office:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that this complaint is complete, true and correct to the best of my knowledge and belief.*

Your signature _____ Michael DeRousie _____

Date signed _____ 10-15-13 _____

Place signed (city and county)

____ Port Angeles
City

Clallam _____
County

Attachments

Check here if you are attaching copies of documentary evidence or extra pages explaining your complaint.

**RCW 9A.72.040 says that "(1) A person is guilty of false swearing if he makes a false statement which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."*

**Washington State Public Disclosure Commission
Instructions for Filing a Formal Complaint**

⚡ When to use the formal complaint form:

While this form is not required, its use is recommended when you want to file formal allegations of a violation of the Public Disclosure Commission (PDC) statutes or rules. You can find the PDC statutes and rules on the PDC website at www.pdc.wa.gov. If you have information or concerns about a possible violation but do not wish to file a complaint, please contact the PDC office directly.

⚡ How to submit your complaint form to the PDC:

- Complete all sections. If you do not have some information, please write "unknown" instead of leaving a blank space.
- Attach copies of any evidence you have - we'll contact you if we need originals.
- Sign the oath if your complaint is against an elected official or a candidate for elective office.
- Mail, fax, or email your complaint and all attachments to the PDC.

⚡ If you have more questions:

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If you have more questions about filing a complaint, see the "Frequently Asked Questions about Filing a Complaint" guide available on the PDC's website at www.pdc.wa.gov under "Enforcement and Compliance." You may also contact the PDC directly.

PDC Contact Information

MAILING ADDRESS: Washington State Public Disclosure Commission
711 Capitol Way, Room 206
PO Box 40908
Olympia, WA 98504-0908

EMAIL ADDRESS: pdc@pdc.wa.gov

PHONE: 1-877-601-2828 (toll free)

FAX: (360) 753-1112

HOURS: Monday-Friday, 8:00 a.m. – 5:00 p.m., closed on state holidays.

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OCT 16 2013

Public Disclosure Commission

**CASH RECEIPTS
 MONETARY
 CONTRIBUTIONS**

C3
 (1/02)

THIS SPACE FOR OFFICE USE
 100544203
 09-20-2013

Candidate or Committee Name (Do not abbreviate. Use full name.)
 Citizens Against Fire District 2 Levy

Mailing Address
 PO Box 1481

City Zip + 4 Office Sought (candidates) Election Date
 Port Angeles, WA 98362 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c).....		
c. Loans, notes, security agreements. Attach Schedule L		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
09/19/13	ERIC FOTH 1354 Henry Boyd Road Port Angeles, WA 98362				500.00	500.00
		Occupation				
		RETIREED				
09/19/13	STACY RAMBO PO Box 1693 Port Angeles, WA 98362				1,000.00	1,000.00
		Occupation				
		HOMEMAKER				
09/19/13	G C BAIZ PO Box 2867 Port Angeles, WA 98362	Michael's Port Angeles, WA			400.00	400.00
		Occupation				
		RESTAURANT				
09/19/13	A R STOWELL PO Box 2867 Port Angeles, WA 98362	US ARMY Honolulu , HI			1,300.00	1,300.00
		Occupation				
		TRUCK DRIVER				
09/19/13	JESSICA SUMNERS PO Box 2623 Sequim, WA 98382	Sumners Beauty Sequim, WA			1,300.00	1,300.00
		Occupation				
		SELF EMPLOYED				
	<input checked="" type="checkbox"/> Check here if additional pages are attached				Sub-total 4,500.00	*See reverse for details.
					Amount from attached pages 2,500.00	
3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.					7,000.00	

4. Date of Deposit: 09/19/13

Treasurer's Daytime Telephone No.: (360) 460-1988

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Dan Shoththafer Date: 09-20-2013

RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 2

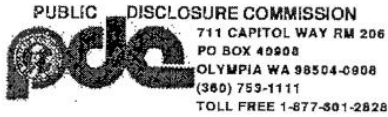
Candidate or Committee Name (Do not abbreviate. Use full name.)
 Citizens Against Fire District 2 Levy

Deposit Date
 09/19/13

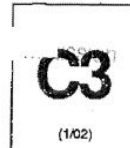
2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I	G E N	Amount	Aggregate Total*
09/19/13	CORRINE NOTAR 1414 W 7th Street Port Angeles, WA 98363	Olympic Ambulance Sequim, WA Occupation BOOKKEEPER			1,250.00	1,250.00
09/19/13	LINDA MELLOTT 54001 Hwy 112 Port Angeles, WA 98363	Sherwood Assisted Living Sequim, WA Occupation ACCOUNTANT			1,250.00	1,250.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				

Page Total 2,500.00



CASH RECEIPTS MONETARY CONTRIBUTIONS



THIS SPACE FOR OFFICE USE

100544953

09-27-2013

Candidate or Committee Name (Do not abbreviate. Use full name.) Citizens Against Fire District 2 Levy			
Mailing Address PO Box 1481			
City Port Angeles, WA	Zip + 4 98362	Office Sought (candidates)	Election Date 2013

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received	Amount	Total
a. Anonymous		
b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
c. Loans, notes, security agreements. Attach Schedule L		
d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
e. Small contributions \$25.00 or less not itemized and number of persons giving _____ (persons)		

2. CONTRIBUTIONS OVER \$25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State	P R I N	G E N	Amount	Aggregate* Total
09/27/13	FRANK BEUTLER PO Box 1993 Sequim, WA 98382	Olympic Oxygen Sequim, WA Occupation SERVICE TECH			1,000.00	1,000.00
09/27/13	GAIL READER 627 E 11th Street Port Angeles, WA 98362	Olympic Ambulance Sequim, WA Occupation BILLING MANAGER			1,000.00	1,000.00
09/27/13	TODD MCCLAIN 1754 Chicken Coop Road Sequim, WA 98382	Olympic Oxygen Services Sequim, WA Occupation TECH			1,000.00	1,000.00
09/27/13	RENA KEITH 150 Cliff Robinson Lane Sequim, WA 98382	Olympic Ambulance Sequim, WA Occupation ADMINISTRATOR			1,000.00	1,000.00
09/27/13	JOHN SCHONIG 294 Dungeness Meadows Sequim, WA 98382	Olympic Ambulance Sequim, WA Occupation FLEET MANAGER			1,000.00	1,000.00
<input type="checkbox"/> Check here if additional pages are attached		Sub-total			5,000.00	*See reverse for details.
		Amount from attached pages			0.00	

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT

Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4.

5,000.00

4. Date of Deposit

09/27/13

Treasurer's Daytime Telephone No.: (360) 460-1988

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature

Date

Dan Shottthafer

09-27-2013

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JAN -3 2014

William Littlejohn
550 W. Hendrickson Rd.
Sequim, WA 98382
360-681-4882

Public Disclosure Commission

Philip E. Stutzman
Director of Compliance
State of Washington Public Disclosure Commission
Po Box 40908
Olympia, WA 98504-0908

December 31, 2013

RE: PDC Case # 14-013

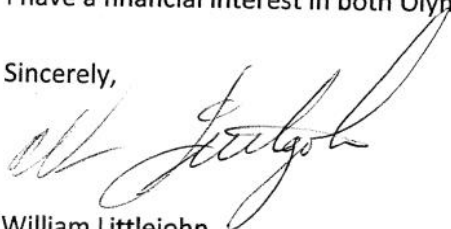
Dear Mr. Stutzman,

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.

Sincerely,



William Littlejohn

MAR 13 2014

LAW OFFICES
LIVENGOOD, FITZGERALD & ALSKOG
A PROFESSIONAL LIMITED LIABILITY COMPANY

Public Disclosure Commission

JAMES S. FITZGERALD+
DAVID A. ALSKOG
DAVID B. JOHNSTON
JOHN J. WHITE, JR.
DAVID J. SEELEY*
KEVIN B. HANSEN
THOMAS K. WINDUS+
GREGORY A. McBROOM
HUGH W. JUDD, P.S.+
ANNALISA C. DANYSH+
GRADY L. WILLIAMSON**

121 THIRD AVENUE
POST OFFICE BOX 908
KIRKLAND, WASHINGTON 98083-0908

PHONE:(425) 822-9281
FAX: (425) 828-0908
E-Mail: white@lfa-law.com

*ALSO ADMITTED IN CALIFORNIA
**ALSO ADMITTED IN OREGON
+OF COUNSEL

March 10, 2014

Kurt Young
PDC Compliance Officer
Public Disclosure Commission
711Capitol Way, Room 206
P.O. Box 40908
Olympia, WA 98504-0908

Re: PDC Case No. 14-013

Dear Mr. Young:

I am responding to your letter dated February 11, 2014, regarding the Fire District 2 Levy Campaign. This response is on behalf of Bill Littlejohn.

- Did Mr. Littlejohn make contributions to Citizens Against prior District 2 Levy Committee in the name of other contributors?

Yes.

- Summary regarding contributions.

In September 2013, Mr. Littlejohn asked a number of people whether he could make a contribution on their behalf to the Committee opposing the Fire District 2 Levy. He asked each individual if he could make a contribution on their behalf to the Committee. The conversations took place over the course of about a week. The names of the individuals and the amounts of the contribution made on their behalf are reflected in the Form C-3s attached to this response.

The contributions were made in cash, accompanied by a list showing the contributor information and amount.

- Contribution information.

The total contributions that Mr. Littlejohn made on behalf of the named individuals was \$7,500.00. The money was contributed on two occasions, on or about September 19 and September 27, 2013. On September 19, \$2,500.00 was contributed, along with the

MAR 13 2014

Kurt Young
PDC Case No. 14-013
March 10, 2014
Page 2

Public Disclosure Commission

information about the individuals on whose behalf the contribution was being made. The September 27 contributions were handled similarly. When the contribution was ready, Mr. Littlejohn had whoever was at the office front desk at that time call the Committee to let them know that there was a contribution for the Committee. Someone from the Committee picked up the contribution. The list showing contributor information was the only communication provided to the Committee regarding the contributions.

- Reasons for the contributions.

Relations with the Chief of Fire District No. 2 had been tense for some time. The Chief had made demands on Mr. Littlejohn's company to permanently locate aid cars in each of the fire stations operated by the District. The District's call volume did not warrant full-time staffing of each station with paramedics. Mr. Littlejohn believed that the Chief's push for a levy to establish permanent paramedic staffing was a result of the objection to the Chief's assertion that there was any need for full-time staffing at each station in the largely rural, sparsely populated district.

Mr. Littlejohn further feared that if he contributed to the Campaign opposing the Chief's plan, that his company would suffer further retaliation. In fact, the Fire Chief has retaliated, seeking to bar Olympic Ambulance from even operating within the geographic boundaries of the Fire District, something that is beyond his legal authority to do.

Mr. Littlejohn has suffered retaliation in the past for participating in Fire District levy campaigns. In a similar levy in Mason County, he supported the opposition. Following the defeat of the levy, the fire union barred its members from working for Olympic Ambulance or any of Mr. Littlejohn's companies. His political participation has been limited and he had no understanding of the basics, let alone the details, of Washington's campaign finance laws.

Very truly yours,

LIVENGOOD, FITZGERALD
& ALSKOG, PLLC



John J. White, Jr.

JJW/lw
Enclosure: a/s
cc: Craig Miller - via e-mail: cmiller@craiglmiller.com

Kurt Young

From: Rena Keith [rena@sherwoodal.com]
Sent: Monday, February 10, 2014 3:38 PM
To: Kurt Young; PDC

In regards to the statement concerning contributions made to Citizens Against Fire District 2 Levy a contribution was made in my name but was not from my personal funds.

Rena Keith

Kurt Young

From: Corrine Notar [corrine@sherwoodal.com]
Sent: Monday, February 10, 2014 2:54 PM
To: Kurt Young
Subject: Confirmation of Contributions to Citizens Against Fire Dist #2 Levy

In regards to the statement concerning contributions made to Citizens Against Fire District 2 Levy a contributions was made on my behalf but was not from my personal funds.

Corrine Notar
1417 W 7th Street
Port Angeles WA 98363

Kurt Young

From: John [john@olympicambulance.com]
Sent: Monday, February 10, 2014 3:41 PM
To: Kurt Young
Subject: Reply to Confirmation of Contribution to Citizens Against Fire District 2 Levy dated January 31, 2014

Dear Mr. Young:

In the regards to the your letter concerning contributions made to Citizens Against Fire District 2 Levy, a contribution was made in my name but it was not from my personal funds.

Sincerely,

John Schonig
Fleet Manager
Purchasing
Olympic Ambulance, Inc
601 W. Hendrickson Rd.
Sequim, Wa 98382
Phone: (360)683-1912
Cell: (360)460-0985
Fax: (360)582-0197
john@olympicambulance.com

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This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Bill Littlejohn In-person Interview
PDC Case No. 14-013
June 5, 2014

The following are excerpts from a recorded in-person investigative interview conducted under oath with Bill Littlejohn in PDC Case No. 14-013.

- Kurt Young, PDC Compliance Officer, and Phil Stutzman, PDC Director of Compliance conducted an investigative interview with Bill Littlejohn in PDC Case No. 14-013. John J. White, an attorney with the firm Livengood Alskog, was also present, representing Mr. Littlejohn.
- Mr. Littlejohn stated that when he approached some of his employees about making contributions to CAFD 2 Levy, he asked if any had a problem with him making a contribution in their name.
- Mr. Littlejohn said he approached the employees he was close to and knew well. He said he spoke to the employees when they were alone, and sought permission to use their name as contributors to CAFD2 Levy.
- Mr. Littlejohn stated that none of the employees he spoke with expressed any reservations about letting their names be used as contributors. When he was asked whether he asked John Schonig for permission to make a contribution in his name to CAFD 2 Levy committee, Mr. Littlejohn said he thought he had asked for permission.
- Mr. Littlejohn stated when he spoke to his employees; he did not state or imply that making a contribution to the PAC in their name was similar to making a charitable contribution in their name. He said he did not promise any employees payment, compensation, or other rewards for allowing him to list their names as contributors.
- Mr. Littlejohn stated that he made the contributions in the name of others, rather than in his own name, because he was trying to keep a “low profile.” He stated that the ballot measure was a threat to some of his businesses, and he did not think there was a problem in making the contributions in the manner in which they were made.
- He was asked about his employee’s statements that Mr. Littlejohn received “negative press” for contributions he made to oppose a 2010 Mason County Fire District annexation ballot measure. He said it was not so much negative press, as it was fall-out from taking on the fire district and firefighters “brotherhood.” He said he made the contributions to Citizens Against Annexation using his personal funds.
- Mr. Littlejohn said that the 2010 Annexation measure involved Mason County Fire District No. 5 merging with the City of Shelton, which if approved would have reduced the service area for Olympia Ambulance. He stated that his experience with the fire district concerning the contributions he made to oppose the 2010 ballot measure influenced how he orchestrated his 2013 contributions to CAFD2 Levy.

- Mr. Littlejohn stated that he has been in the ambulance business for many years, and has provided the only ambulance service in the Port Angeles and Sequim areas, as well as rural areas on the Peninsula prior to fire districts providing that service. He stated that he has worked closely with many fire districts in the counties in which Olympic Ambulance operates, and provided some of the first ambulance, EMT and first responder services prior to the fire districts providing their own services. He stated that he was doing that type of work long before they began doing it.
- Mr. Littlejohn stated that he did not make a withdrawal of cash from any bank or financial institution to make the contributions. He said he went to see Corrine Notar, Bookkeeper for Olympic Ambulance, and told her he needed cash, and she gave it to him. He said he used the cash to make the contributions to CAFD 2 Levy. He said that he wrote instructions about how CAFD 2 Levy was to attribute the cash contributions to each of his employees, and then placed the cash in an envelope.
- Mr. Littlejohn said that he left the envelope with the cash and instructions with a staff person at the front desk for CAFD 2 Levy to pick up, and contacted Eric Foth with the committee. He said he informed Mr. Foth that an envelope with the contributions was ready to be picked up at the front desk. He said he thought he contacted Eric on two separate occasions concerning picking up contributions for CAFD 2 levy.
- Mr. Littlejohn stated that other than a meeting with Mr. Foth prior to making the contributions, his contacts with him were limited to giving him the contributions. He said he had nothing to do with CAFD 2 Levy, and was not a committee decision maker. He said that other than contacting CAFD 2 Levy about the two cash contributions, he had no contact with the committee. He said no one from the committee asked about the cash contributions.
- Mr. Littlejohn confirmed that he made a “personal draw” of cash from Olympic Ambulance, to make the contributions.
- Mr. Littlejohn confirmed that he made the contributions using cash in order to avoid leaving a paper trail.
- Mr. Littlejohn stated that he was the principal decision-maker, and the only person involved with making contributions on behalf of his employees, using cash. He stated that he briefly discussed this issue with his manager, Kim Droppert, formerly Kim Doyle, but said he did not seek permission to use her name because she managed his businesses. He said that Ms. Doyle has worked for him for approximately 15 years.
- Mr. Littlejohn stated Ms. Doyle ran the 2010 Citizens Against Annexation (CAA) committee, and was much more involved in the issue since she lived in Mason County. He stated that he did not have anything to do with the formation or running of that committee, but acknowledged having conversations with Ms. Doyle about the campaign. He stated that he willingly gave the contributions to CAA since the proposed annexation would have affected a good chunk of Olympic Ambulance’s Mason County business. He said he believed Ms. Doyle asked him for the contributions, but that he was not involved with any of the decisions or the content of any of CAA political advertisements.

- Mr. Littlejohn stated that he was not sure of the exact date when he decided he was going to make cash contributions for the 2013 election, but said it was probably early September 2013. He said his decision was not influenced by the formation of CAFD 2 Levy.
- Mr. Littlejohn stated that he did not know GC Baiz; AR Stowell; or Jessica Summers. He said he did not provide the funds for their contributions.
- Mr. Littlejohn was asked why he made the statement in the last sentence of his January 3, 2014, response letter, “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.” He said his response was in answer to the question asked by PDC staff in its December 23, 2013 complaint letter. He stated that staff’s question was pretty specific, and he answered it.