

**William Geyer**  
**1008 16<sup>th</sup> Street**  
**Bellingham, WA 98225-6606**

November 6, 2007  
Via Federal Express

Mr. Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2007 NOV -7 3:18  
RE: MUR-594

Dear Mr. Jordan:

I received your October 23, 2007 letter at my home via regular mail on October 27, 2007 informing me of a citizen complaint regarding a donation to my Bellingham City Council 2007 campaign. My response below demonstrates that no action should be taken by the Federal Election Commission on this claim and the claim should be dismissed.

The contribution in question was made on September 19, 2007 in the amount of \$500.00 by Kent Properties LLC, a Washington State Licensed LLC (Exhibit A attached). The check was deposited along with other contributions received at the same time on September 24, 2007. A copy of our Washington State Public Disclosure Commission (PDC) Form C3 of the same date is attached (Exhibit B). Upon filing, it was discovered Kent Properties, although a Washington corporation, maintains a Canadian address for its bank statements at Suite 412 - 1770 West 7<sup>th</sup> Avenue, Vancouver, BC V6J 4Y6. We contacted the State PDC staff who advised us to return payment to Kent Properties and amend our PDC Form C3.

We took corrective action on October 4, 2007 by sending a letter (Exhibit C) with a check for \$500.00 to Kent Properties (Exhibit D) and filed an amended PDC Form C3 on the same date (Exhibit E). The repayment check to Kent Properties cleared our bank account on October 16, 2007 (Exhibit F). During this time, none of the funds attributed to Kent Properties check were used for any campaign expense and all funds were returned within the prescribed 10 days outlined in the FEC guidelines.

I respectfully request your office issue a letter that dismisses this claim as without merit and concludes that no additional action is required by the FEC.

Respectfully Submitted,




William T. Geyer  
Candidate for Bellingham City Council  
Phone: 360-738-2836 / email: [billgeyer@comcast.net](mailto:billgeyer@comcast.net)

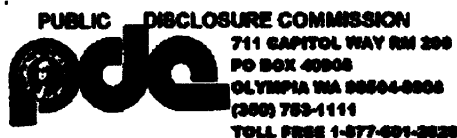
28190274154

Exhibit A

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2007 NOV -1 P 3 19

28190274155

|  |                                |                          |
|--|--------------------------------|--------------------------|
| <b>KENT PROPERTIES LLC</b><br>SUITE 412 - 1770 W 7TH AVE<br>VANCOUVER, BC V6J 4Y6  |                                | 1677<br>06-019/1251      |
| PAY TO THE ORDER OF  | <u>Citizens for Bill Ceyer</u> | DATE <u>19 Sept 2007</u> |
|  | <u>Five hundred — 00/100</u>   | \$ <u>500.00</u>         |
|  |                                | DOLLARS                  |
|  <b>BANNER BANK</b><br>1400 Chestnut Avenue<br>P.O. Box 800 1-800-469-0972<br>Vancouver, BC V6C 2E5 |                                |                          |
| OR   |                                |                          |



# CASH RECEIPTS MONETARY CONTRIBUTIONS

**C3**  
(102)

Exhibit B  
(3 pages)  
THIS SPACE FOR OFFICE USE

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2007 NOV - 7 P 3 19

Candidate or Committee Name (Do not abbreviate. Use full name.)  
WILLIAM GEYER (Citizens for Bill Geyer)

Mailing Address  
PO Box 31836

City Zip + 4  
Bellingham 98228-3836

Office Sought (candidates)  
CITY COUNCIL MEMBER

Election Date  
2007

## 1 MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

| Date Received |  | Amount | Total    |
|---------------|--|--------|----------|
|               | a. Anonymous   | \$0.00 | \$139.00 |
|               | 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:<br>Employer's Name, City and State | P<br>R<br>I<br>N<br>T<br>G<br>E<br>N | Amount     | Aggregate*<br>Total       |
|---------------|---|--|--------------------------------------|------------|---------------------------|
| 09/24/2007    | CURNOW & CURNOW<br>1720 Iowa Street<br>Bellingham WA 98229                      |  |                                      | \$125.00   | \$125.00                  |
|               |   | Occupation   |                                      |            |                           |
| 09/24/2007    | CELESTE SHIPP<br>2694 N Shore Drive<br>Bellingham WA 98226                      |  |                                      | \$100.00   | \$100.00                  |
|               |   | Occupation   |                                      |            |                           |
| 09/24/2007    | SHEILA RICHARDSON<br>PO Box 1312<br>Bellingham WA 98227-1312                    |  |                                      | \$50.00    | \$75.00                   |
|               |   | Occupation   |                                      |            |                           |
| 09/24/2007    | DAVE COTTINGHAM LAW OFFICE<br>105 EAST HOLLY SUITE 418<br>BELLINGHAM WA 98225   |  |                                      | \$150.00   | \$150.00                  |
|               |   | Occupation   |                                      |            |                           |
| 09/24/2007    | RHODERICK ELIN<br>6850A Raspberry Dr<br>Everson WA 98247                        | CATHOLIC COMMUNITY SERVICES<br>BELLINGHAM WA                         |                                      | \$100.00   | \$200.00                  |
|               |   | Occupation ADMINISTRATOR   |                                      |            |                           |
|               | <input checked="" type="checkbox"/> Check here if additional pages are attached | Sub-total  |                                      | \$525.00   | *See reverse for details. |
|               |   | Amount from attached pages   |                                      | \$2,697.50 |                           |

## 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.

\$3,222.50

4. Date of Deposit

09/24/2007

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

Treasurer's Signature

Date

Treasurer's Daytime Telephone No.: (360) 671-1845

28190274156

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 1

Candidate or Committee Name (Do not abbreviate. Use full name.)  
WILLIAM GEYER (Citizens for Bill Geyer)

Deposit Date  
09/24/2007

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                         | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I<br>N<br>T<br>N<br>O<br>T<br>E | Amount   | Aggregate<br>Total |
|---------------|---|--|---|----------|--------------------|
| 09/24/2007    | CHARLES CRABTREE<br>329 W Hemmi Rd<br>Bellingham WA 98226             | CHARLES CRABTREE<br>BELLINGHAM WA<br>OccupationSELF                  |   | \$50.00  | \$150.00           |
| 09/24/2007    | INDUSTRIAL SUPPLY<br>2432 E BAKEVIEW ROAD<br>BELLINGHAM WA 98226      | Occupation   |   | \$247.50 | \$247.50           |
| 09/24/2007    | ROBERT DAHMS<br>238 TERRACE PLACE<br>BELLINGHAM WA 98225              | Occupation   |   | \$100.00 | \$100.00           |
| 09/24/2007    | MIKE HAMMES<br>224 SUDDEN VALLEY<br>BELLINGHAM WA 98229               | RAM CONSTRUCTION<br>BELLINGHAM WA<br>OccupationCONTRACTOR            |   | \$500.00 | \$500.00           |
| 09/24/2007    | KENT PROPERTIES, LLC<br>SUITE 412-1770 W 7TH AVE<br>VANCOUVER V6J4Y6  | Occupation   |   | \$500.00 | \$500.00           |
| 09/24/2007    | WILSON MOTORS<br>405 EAST CHAMPION PO BOX 1196<br>BELLINGHAM WA 98227 | Occupation   |   | \$500.00 | \$500.00           |
| 09/24/2007    | ROBERT MILLER<br>3610 MERIDIAN STREET<br>BELLINGHAM WA 98225          | Occupation   |   | \$100.00 | \$100.00           |
| 09/24/2007    | GRAGG MILLER<br>3610 MERIDIAN STREET<br>BELLINGHAM WA 98225           | Occupation   |   | \$100.00 | \$100.00           |
| 09/24/2007    | THE SWANSON GROUP<br>515 W BAKERVIEW ROAD<br>BELLINGHAM WA 98226      | Occupation   |   | \$100.00 | \$100.00           |
| 09/24/2007    | ADOLINE BROWN<br>1022 17th Street<br>Bellingham WA 98225              | Chicago Title<br>BELLINGHAM WA<br>OccupationVICE PRESIDENT           |   | \$50.00  | \$150.00           |
| 09/24/2007    | KERRY BROWN<br>1022 17th Street<br>Bellingham WA 98225                | N/A<br>BELLINGHAM WA<br>OccupationSELF                               |   | \$50.00  | \$150.00           |

Page Total \$2,297.50

28190274157

Grant Deger, Chairman  
Gene Bell, Treasurer

Email: [TelBill@BillGeyer.com](mailto:TelBill@BillGeyer.com)  
Website: [www.BillGeyer.com](http://www.BillGeyer.com)

**Bill Geyer**  
for Bellingham 5th Ward  
City Council

October 4, 2007

Mr. Andre Mohlnar  
One Bellwether Way  
Bellingham, WA 98225

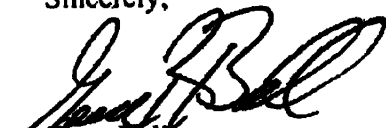
Re: Bill Geyer Contribution

Dear Mr. Mohlnar,

Thank you so much for your contribution to Bill Geyer's campaign. Unfortunately, due to very strict campaign laws, we are not allowed to accept payments from foreign entities. The check written to Mr. Geyer's campaign was written from Kent Properties, LLC which has an address in Vancouver, BC.

Please accept the refund check enclosed and again thank you so much for your continuing support.

Sincerely,

  
Gene Bell,  
Treasurer

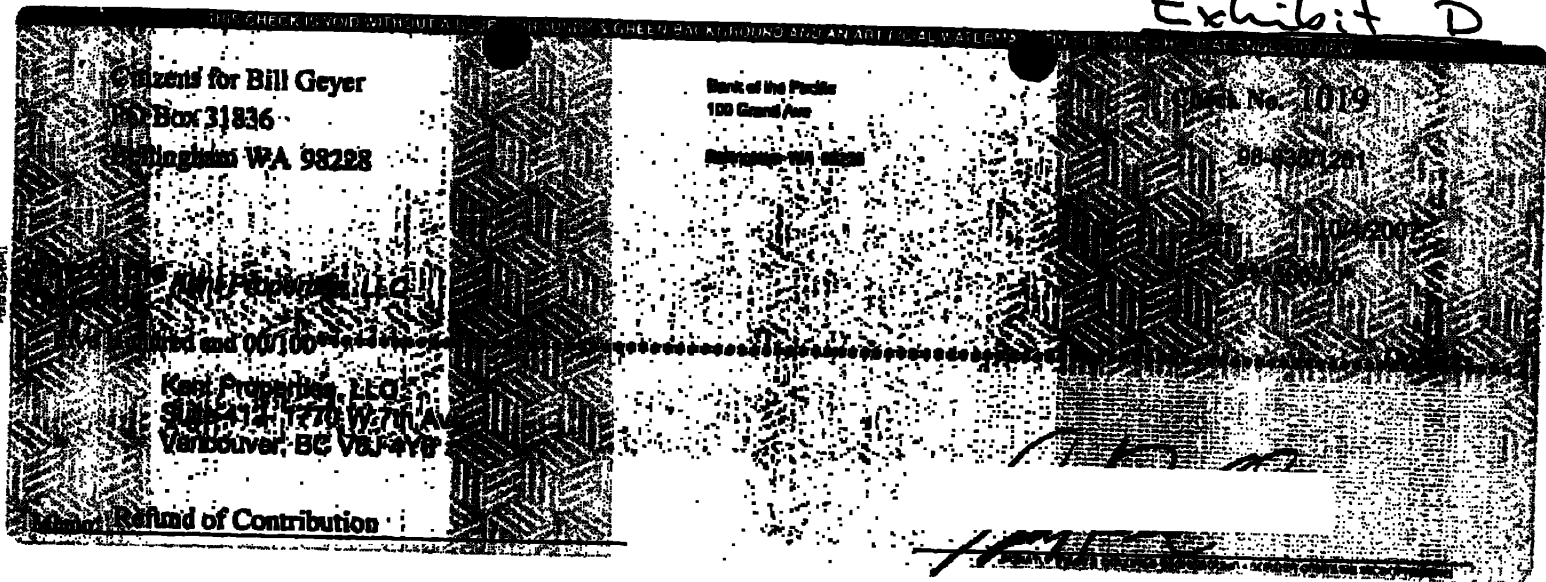
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 NOV -7 P 3:19

28190274158



Exhibit D



28190274159

Record of Payment    Check: 1019    Payee: Kent Properties, LLC    10/4/2007

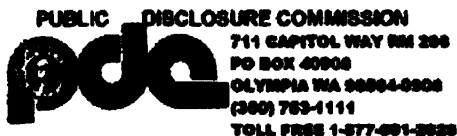
RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2007 NOV -7 P 3 19

Citizens for Bill Geyer    Refund of Contribution    \$\*\*500.00\*

Record of Payment    Check: 1019    Payee: Kent Properties, LLC    10/4/2007

500.00

Citizens for Bill Geyer    Refund of Contribution    \$\*\*500.00\*



# CASH RECEIPTS MONETARY CONTRIBUTIONS

C3

(102)

Exhibit E

(3 pages)

THIS SPACE FOR OFFICE USE

Amended  
filing  
- Kent Properties  
deleted  
from filing.

Candidate or Committee Name (Do not abbreviate Use full name.)

WILLIAM GEYER (Citizens for Bill Geyer)

Mailing Address

PO Box 31836

City

Bellingham

Zip + 4

98228-3836

Office Sought (candidates)

CITY COUNCIL MEMBER

Election Date

2007

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|               | 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:<br>Employer's Name, City and State | P<br>R<br>I<br>N<br>T<br>N<br>A<br>M<br>E | Amount                                |          |
|---------------|---|--|---|---------------------------------------|----------|
| 09/24/2007    | CURNOW & CURNOW<br>1720 Iowa Street<br>Bellingham WA 98229                      |  |   | \$125.00                              |          |
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|               |   | Occupation   |   |                                       |          |
| 09/24/2007    | SHEILA RICHARDSON<br>PO Box 1312<br>Bellingham WA 98227-1312                    |  |   | \$50.00                               | \$75.00  |
|               |   | Occupation   |   |                                       |          |
| 09/24/2007    | DAVE COTTINGHAM LAW OFFICE<br>105 EAST HOLLY SUITE 418<br>BELLINGHAM WA 98225   |  |   | \$150.00                              | \$150.00 |
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|               |   | Occupation ADMINISTRATOR   |   |                                       |          |
|               | <input checked="" type="checkbox"/> Check here if additional pages are attached |  |   | Sub-total \$525.00                    |          |
|               |   |  |   | Amount from attached pages \$2,197.50 |          |

## 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.

\$2,722.50

\*See reverse for details.

## 4. Date of Deposit

09/24/2007

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

Treasurer's Signature

Date

Treasurer's Daytime Telephone No.: (360) 671-1845

28190274160

2007 NOV - 1 P 3 19

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

# RECEIPTS CONTINUATION SHEET (Attachment to C-3 Form)

Page 1

Candidate or Committee Name (Do not abbreviate Use full name)  
WILLIAM GEYER (Citizens for Bill Geyer)

Deposit Date  
09/24/2007

## 2. CONTRIBUTIONS OVER \$25.00

| Date Received | Contributor's Name, Address, City, State, Zip                         | Contributions of more than \$100:<br>Employer's Name, City and State | P<br>R<br>I<br>N | G<br>E<br>N | Amount   | Aggregate<br>Total |
|---------------|---|--|------------------|-------------|----------|--------------------|
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| 09/24/2007    | WILSON MOTORS<br>405 EAST CHAMPION PO BOX 1196<br>BELLINGHAM WA 98227 | Occupation   |                  |             | \$500.00 | \$500.00           |
| 09/24/2007    | ROBERT MILLER<br>3610 MERIDIAN STREET<br>BELLINGHAM WA 98225          | Occupation   |                  |             | \$100.00 | \$100.00           |
| 09/24/2007    | GRAGG MILLER<br>3610 MERIDIAN STREET<br>BELLINGHAM WA 98225           | Occupation   |                  |             | \$100.00 | \$100.00           |
| 09/24/2007    | THE SWANSON GROUP<br>515 W BAKERVIEW ROAD<br>BELLINGHAM WA 98226      | Occupation   |                  |             | \$100.00 | \$100.00           |
| 09/24/2007    | ADOLINE BROWN<br>1022 17th Street<br>Bellingham WA 98225              | Chicago Title<br>BELLINGHAM WA<br>OccupationVICE PRESIDENT           |                  |             | \$50.00  | \$150.00           |
| 09/24/2007    | KERRY BROWN<br>1022 17th Street<br>Bellingham WA 98225                | N/A<br>BELLINGHAM WA<br>OccupationSELF                               |                  |             | \$50.00  | \$150.00           |
| 09/24/2007    | GENE SHANNON<br>98 MOREY AVENUE<br>BELLINGHAM WA 98225                | FAIRHAVEN VILLAGE INN<br>BELLINGHAM WA<br>OccupationINNKEEPERS       |                  |             | \$200.00 | \$200.00           |

Page Total \$1,997.50

28190274161



BILL GEYER  
GENE R BELL II  
CITIZENS FOR BILL GEYER  
PO BOX 31836  
BELLINGHAM WA 98228-3836

30

0  
23

2007 NOV - 7 P 3 19

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

BELLINGHAM BRANCH  
100 GRAND AVENUE  
BELLINGHAM WA 98225

TELEPHONE: 360-734-0544

Age 50 or better?  
Contact your local branch  
for information about our  
NEW Essential 50+ Checking Account!

=====

ESSENTIAL CHECKING ACCOUNT

=====

LAST STATEMENT 09/28/07 13,839.35  
18 CREDITS 15,460.00  
23 DEBITS 24,972.26  
THIS STATEMENT 10/31/07 4,327.09

----- DEPOSITS -----

| REF # | DATE  | AMOUNT | REF # | DATE  | AMOUNT   | REF # | DATE  | AMOUNT   |
|-------|-------|--------|-------|-------|----------|-------|-------|----------|
|       | 10/01 | 835.00 |       | 10/12 | 1,550.00 |       | 10/25 | 2,200.00 |
|       | 10/03 | 550.00 |       | 10/16 | 900.00   |       | 10/26 | 1,225.00 |
|       | 10/03 | 800.00 |       | 10/18 | 500.00   |       | 10/29 | 250.00   |
|       | 10/09 | 100.00 |       | 10/19 | 1,050.00 |       | 10/30 | 1,200.00 |
|       | 10/10 | 300.00 |       | 10/22 | 625.00   |       | 10/31 | 850.00   |
|       | 10/10 | 950.00 |       | 10/24 | 150.00   |       | 10/31 | 1,425.00 |

----- CHECKS -----

| CHECK # | DATE  | AMOUNT   | CHECK # | DATE  | AMOUNT   | CHECK # | DATE  | AMOUNT   |
|---------|-------|----------|---------|-------|----------|---------|-------|----------|
| 2*      | 10/12 | 410.00   | 1023    | 10/12 | 2,013.14 | 1033*   | 10/25 | 3,162.46 |
| 1016    | 10/01 | 46.00    | 1024*   | 10/15 | 675.00   | 1035    | 10/26 | 1,347.46 |
| 1017    | 10/04 | 1,080.00 | 1026    | 10/19 | 380.00   | 1036    | 10/29 | 385.00   |
| 1018    | 10/12 | 550.00   | 1027    | 10/17 | 1,440.00 | 1037*   | 10/31 | 1,440.00 |
| X 1019  | 10/16 | 500.00   | 1028    | 10/17 | 4,532.75 | 1040*   | 10/31 | 381.00   |
| 1020    | 10/15 | 1,480.00 | 1029    | 10/22 | 385.00   | 1066    | 10/11 | 1,850.72 |
| 1021    | 10/16 | 100.00   | 1030    | 10/22 | 1,960.00 |         |       |          |
| 1022    | 10/11 | 330.73   | 1031*   | 10/26 | 423.00   |         |       |          |

(\*) INDICATES A GAP IN CHECK NUMBER SEQUENCE

\* \* \* C O N T I N U E D \* \* \*

BILL GEYER

 =====  
 ESSENTIAL CHECKING ACCOUNT 1080020694  
 =====

 ----- OTHER DEBITS -----  

| DESCRIPTION        | DATE  | AMOUNT |
|--------------------|-------|--------|
| DEPOSIT CORRECTION | 10/16 | 100.00 |

 ----- DAILY BALANCE -----  

| DATE..... | BALANCE   | DATE..... | BALANCE   | DATE..... | BALANCE  |
|-----------|-----------|-----------|-----------|-----------|----------|
| 10/01     | 14,628.35 | 10/15     | 10,488.76 | 10/25     | 3,353.55 |
| 10/03     | 15,978.35 | 10/16     | 10,688.76 | 10/26     | 2,808.09 |
| 10/04     | 14,898.35 | 10/17     | 4,716.01  | 10/29     | 2,673.09 |
| 10/09     | 14,998.35 | 10/18     | 5,216.01  | 10/30     | 3,873.09 |
| 10/10     | 16,248.35 | 10/19     | 5,886.01  | 10/31     | 4,327.09 |
| 10/11     | 14,066.90 | 10/22     | 4,166.01  |           |          |
| 10/12     | 12,643.76 | 10/24     | 4,316.01  |           |          |

\* Note: daily balance exceeds  
 Kent Properties donation  
 during entire period  
 under review.

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