

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

RE: MUR-5946

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

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)

Exhibit A

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 NOV - 1 P 3 19

1677

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2007 NOV - 1 P 3 19

Pay to the order of Citibank for Bill Geyer for one thousand \$ 500.00 Dollars 00/100

OR

 BANNER BANK  
1000 10th Avenue  
Vancouver, BC V6Z 1G6  
604.685.1000



**CASH RECEIPTS  
 MONETARY  
 CONTRIBUTIONS**

**C3**

(102)

THIS SPACE FOR OFFICE USE

Exhibit B  
 (3 pages)

RECEIVED  
 FEDERAL ELECTION  
 COMMISSION  
 OFFICE OF GENERAL  
 COUNSEL

2001 NOV - 1 P

19

Election Date  
 2007

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 (candidate)  
 CITY COUNCIL MEMBER

**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. <sup>a</sup> Employer's Name, City and State	P R I O N	Amount	Aggregate* Total
09/24/2007	CURNOW & CURNOW 1720 Iowa Street Bellingham WA 98229			\$125.00	\$125.00
	Occupation				
09/24/2007	CELESTE SHIPP 2694 N Shore Drive Bellingham WA 98226			\$100.00	\$100.00
	Occupation				
09/24/2007	SHEILA RICHARDSON PO Box 1312 Bellingham WA 98227-1312			\$50.00	\$75.00
	Occupation				
09/24/2007	DAVE COTTINGHAM LAW OFFICE 105 EAST HOLLY SUITE 418 BELLINGHAM WA 98225			\$150.00	\$150.00
	Occupation				
09/24/2007	RHODERICK ELIN 6850A Raspberry Dr Everson WA 98247	CATHOLIC COMMUNITY SERVICES BELLINGHAM WA		\$100.00	\$200.00
	Occupation	ADMINISTRATOR			
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total		\$525.00	
		Amount from attached pages		\$2,697.50	
					*See reverse for details.
	<b>3 TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT</b> 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

# 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		Contributions of more than \$100: Employer's Name, City and State	P R I N	Amount	Aggregate Total*
Date Received	Contributor's Name, Address, City, State, Zip				
09/24/2007	CHARLES CRABTREE 329 W Hemmi Rd Bellingham WA 98226	CHARLES CRABRTREE BELLINGHAM WA OccupationSELF		\$50.00	\$150.00
09/24/2007	INDUSTRIAL SUPPLY 2432 E BAKEVIEW ROAD BELLINGHAM WA 98226			\$247.50	\$247.50
09/24/2007	ROBERT DAHMS 238 TERRACE PLACE BELLINGHAM WA 98225			\$100.00	\$100.00
09/24/2007	MIKE HAMMES 224 SUDDEN VALLEY BELLINGHAM WA 98229	RAM CONSTRUCTION BELLINGHAM WA OccupationCONTRACTOR		\$500.00	\$500.00
09/24/2007	KENT PROPERTIES, LLC SUITE 412-1770 W 7TH AVE VANCOUVER V6J4Y6			\$500.00	\$500.00
09/24/2007	WILSON MOTORS 405 EAST CHAMPION PO BOX 1196 BELLINGHAM WA 98227			\$500.00	\$500.00
09/24/2007	ROBERT MILLER 3610 MERIDIAN STREET BELLINGHAM WA 98225			\$100.00	\$100.00
09/24/2007	GRAGG MILLER 3610 MERIDIAN STREET BELLINGHAM WA 98225			\$100.00	\$100.00
09/24/2007	THE SWANSON GROUP 515 W BAKERVIEW ROAD BELLINGHAM WA 98226			\$100.00	\$100.00
09/24/2007	ADOLINE BROWN 1022 17th Street Bellingham WA 98225	Chicago Title BELLINGHAM WA OccupationVICE PRESIDENT		\$50.00	\$150.00
09/24/2007	KERRY BROWN 1022 17th Street Bellingham WA 98225	N/A BELLINGHAM WA OccupationSELF		\$50.00	\$150.00

Page Total \$2,297.50

Grant Dager, Chairman  
Gene Bell, Treasurer

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



October 4, 2007

Mr. Andre Mohlnar  
One Bellwether Way  
Bellingham, WA 98225

Re: Bill Geyer Contribution

RECEIVED  
FEDERAL  
ELECTION  
COMMISSION  
OFFICE OF  
GENERAL  
COUNSEL

2007 NOV - 1 P 3 19

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,



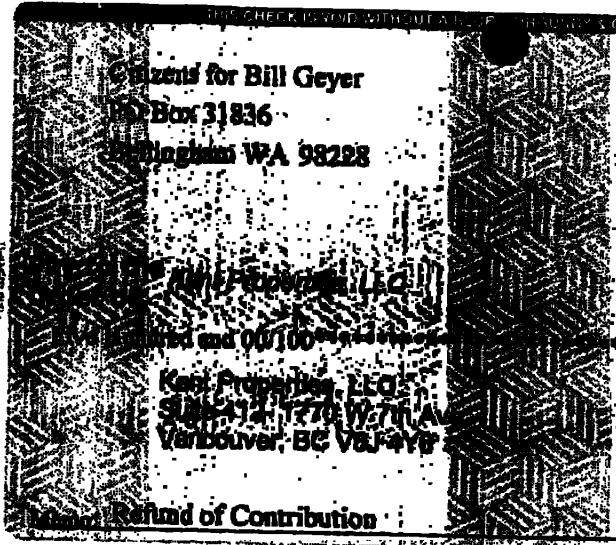
Gene Bell,  
Treasurer

Paid for by Citizens For Bill Geyer

PO Box 31836 • Bellingham, WA 98228-3836 • Ph: 360-738-2836



Exhibit D



Bank of the Pacific  
100 Grand Ave  
Seattle, WA 98101

Check No. 1019  
00-0000261

28190274159

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

500.00 RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2001 NOV - 1 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\*



PUBLIC DISCLOSURE COMMISSION  
711 CAPITOL WAY RM 200  
PO BOX 40906  
OLYMPIA WA 98504-0906  
(360) 783-1111  
TOLL FREE 1-877-431-2828

**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 Zip + 4  
Bellingham 98228-3836

Office Sought (candidate)  
CITY COUNCIL MEMBER

Election Date  
2007

*10/6*

**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. Employer's Name, City and State	P R I N	Amount	2007 NOV -1 P 3 19	FED RECEIVED REALECTION MISSION OFFICE COUNSEL
09/24/2007	CURNOW & CURNOW 1720 Iowa Street Bellingham WA 98229	Occupation		\$125.00		
09/24/2007	CELESTE SHIPP 2694 N Shore Drive Bellingham WA 98226	Occupation		\$100.00		
09/24/2007	SHEILA RICHARDSON PO Box 1312 Bellingham WA 98227-1312	Occupation		\$50.00		
09/24/2007	DAVE COTTINGHAM LAW OFFICE 105 EAST HOLLY SUITE 418 BELLINGHAM WA 98225	Occupation		\$150.00		
09/24/2007	RHODERICK ELIN 6850A Raspberry Dr Everson WA 98247	CATHOLIC COMMUNITY SERVICES BELLINGHAM WA Occupation ADMINISTRATOR		\$100.00		
	<input checked="" type="checkbox"/> Check here if additional pages are attached	Sub-total Amount from attached pages	\$525.00 \$2,197.50			*See reverse for details.
				\$2,722.50		

**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.

**4. Date of Deposit**

09/24/2007

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

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

Treasurer's Signature

Date

# 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			P	G	R	E	I	N	Amount	Aggregate Total
Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than \$100: Employer's Name, City and State								
09/24/2007	CHARLES CRABTREE 329 W Hemmi Rd Bellingham WA 98226	CHARLES CRABRTREE BELLINGHAM WA OccupationSELF							\$50.00	\$150.00
09/24/2007	INDUSTRIAL SUPPLY 2432 E BAKEVIEW ROAD BELLINGHAM WA 98226								\$247.50	\$247.50
09/24/2007	ROBERT DAHMS 238 TERRACE PLACE BELLINGHAM WA 98225								\$100.00	\$100.00
09/24/2007	MIKE HAMMES 224 SUDDEN VALLEY BELLINGHAM WA 98229	RAM CONSTRUCTION BELLINGHAM WA OccupationCONTRACTOR							\$500.00	\$500.00
09/24/2007	WILSON MOTORS 405 EAST CHAMPION PO BOX 1196 BELLINGHAM WA 98227								\$500.00	\$500.00
09/24/2007	ROBERT MILLER 3610 MERIDIAN STREET BELLINGHAM WA 98225								\$100.00	\$100.00
09/24/2007	GRAGG MILLER 3610 MERIDIAN STREET BELLINGHAM WA 98225								\$100.00	\$100.00
09/24/2007	THE SWANSON GROUP 515 W BAKERVIEW ROAD BELLINGHAM WA 98226								\$100.00	\$100.00
09/24/2007	ADOLINE BROWN 1022 17th Street Bellingham WA 98225	Chicago Title BELLINGHAM WA OccupationVICE PRESIDENT							\$50.00	\$150.00
09/24/2007	KERRY BROWN 1022 17th Street Bellingham WA 98225	N/A BELLINGHAM WA OccupationSELF							\$50.00	\$150.00
09/24/2007	GENE SHANNON 98 MOREY AVENUE BELLINGHAM WA 98225	FAIRHAVEN VILLAGE INN BELLINGHAM WA OccupationINNKEEPERS							\$200.00	\$200.00

Page Total \$1,997.50

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2001 NOV - 1 P 3 19

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0  
23

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

28190274162

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
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		DATE	AMOUNT
DESCRIPTION			
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		

28190274163

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