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September 7, 2018

**VIA EMAIL ONLY**

Tabatha Blacksmith  
Washington State Public Disclosure Commission  
P.O. Box 40908  
Olympia, WA 98504-0908

RE: PDC Case No. 40372, No on 1631

Dear Ms. Blacksmith:

I am replying on behalf of the No on 1631 Committee Sponsored by Western States Petroleum Association (the Committee) to your email of September 7, 2018 requesting a response to a complaint filed by James Lazar alleging violations of RCW 42.17A.240 and WAC 390-16-037 by the Committee.

The complaint suggests that the Committee's August 10, 2018 C-4 filing with the PDC did not provide enough detail when it disclosed a July 26, 2018 payment to Amplified Strategies for "mail" and "specifically the number of pieces printed and mailed."

WAC 390-16-037 does not require a specific level of detail in disclosure of political advertising by mail. In addition, nowhere in the online PDC [Political Committee Instructions](#) is there a requirement that the number of mail pieces be disclosed – and notably not on the "[Expenditures that Require Additional Disclosure](#)" page of the Instructions.

Even if disclosure of this level of detail were required, the payment to Amplified Strategies was an advance on mail to be printed and to be mailed the following month. Final payments for this mail project will be disclosed on the C-4 due September 10, 2018 and would also disclose the number of pieces mailed to the extent such disclosure is required.

The Committee intends to meet all public disclosure obligations under RCW 42.17A and WAC 390. If it is the PDC's opinion that disclosure of the number of mail pieces ultimately produced and mailed is required, then the Committee is willing to disclose that information on the appropriate C-4 filing.

I hope you find this information useful. Please contact me if I can provide further information, and I look forward to your response.

Sincerely,



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Dan Brady, WSBA #33731