

Complaint Description

File a Formal Complaint - Kaylee Pigott

[Kaylee Pigott](#) (Tue, 11 Sep at 10:55 PM)

Please find a formal complaint against the NRA attached. Thanks!

What impact does the alleged violation(s) have on the public?

List of attached evidence or contact information where evidence may be found.

List of potential witnesses with contact information to reach them.

Complaint Certification:

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

Public Disclosure Commission
711 Capital Way South, #206
Olympia, WA 98504
September 7, 2018

To Whom It May Concern:

This is a formal Public Disclosure Commission complaint, filed due to violations of Chapter 42.17A of the Revised Code of Washington. The ballot committee “Washingtonians and the National Rifle Association for Freedom, 2018,” organized under RCW 42.17A.205 in opposition to Initiative 1639, is accused of violating the following statutes:

RCW 42.17A.205
RCW 42.17A.235

Violations and Evidence

The committee failed to adequately file required reports on August 10, 2018. As specified by RCW 42.17A.235(2)(c)(i), the committee was required to file a report on August 10, 2018 as the they had raised funds in excess of two-hundred dollars in the prior calendar month (PDC report 100844981 shows a \$100,000 contribution from the National Rifle Association deposited on July 5, 2018).

The committee additionally failed to file their C1 Political Committee Registration in a timely manner. RCW 42.17A.205(1) specifies that registration must be filed within two weeks of organization or a committee expecting to make expenditures or receive contributions. The committee filed their C1 on June 27, 2018. However, the committee had been active since at least April 26, 2018, as evidenced by the Facebook post screenshotted below.



Additionally, the officers of “Washingtonians and the National Rifle Association for Freedom, 2018” have participated in active, organized, and organizational activities in opposition to Initiative 1639 since at

least May 16, 2018, when the National Rifle Association (the organization bankrolling “Washingtonians and the National Rifle Association for Freedom, 2018” and which employs at least most staff and officers of “Washingtonians and the National Rifle Association for Freedom, 2018”) filed a legal challenge against the initiative’s ballot title.

In relation to that legal challenge, that NRA has not reported expenses related to the challenge to the PDC or Washington voters and residents, despite its clear nature as a campaign activitie, nor have expenses related to the NRA’s second legal challenge (with a lawsuit filed on or around July 27, 2018) been reported, despite the fact that the NRA had already established a ballot committee in opposition to Initiative 1639, with employees shared with the national organization, prior to filing the second legal challenge.

Beyond this, the address provided by the committee at which Washingtonians can inspect the committee’s books is at the NRA’s national headquarters in Fairfax, Virginia. This clearly does not a display respect for the transparency desired by Washingtonians and defended by the PDC. Nor does it signal a desire to provide Washington voters with full information about the committee’s activities and funding. Their out-of-state address is also counter to the specific instruction provided to committees about out-of-area addresses on line 9 of Form C1PC. It is not particularly reasonable for a committee, working against a Washington specific measure, with activities confined to Washington, and in a way which only directly impacts Washingtonians to expect voters to travel across the country to inspect the campaign’s books, as Washingtonians are entitled to do under RCW 42.17A.235(4)(a). As such, it appears that the NRA is operating an out-of-state committee as if it is an in-state, ballot committee. If it is the case that the NRA is doing so, they have filed almost none of the required reports.

These violations together continue a pattern of violations and disregard for Washington campaign finance laws by the National Rifle Association and associated committees. A separate committee organized by the National Rifle Association in 2014 to oppose a different Washington initiative was found by the Public Disclosure Commission to have violated multiple disclosure requirements, and was fined the maximum amount allowed. That committee was, just like the current committee, was chaired national NRA leader Chris Cox and named NRA employee Mary Rose Adkins as treasurer. While the 2014 committee and the current committee are legally separate entities, both are essentially outcroppings of the NRA’s national organization.

Thank you for your consideration in this important matter,

Kaylee Pigott