



**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: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdca.wa.gov](http://www.pdca.wa.gov)

Dec. 3, 2018

Delivered electronically to "aug409@gmail.com"

Subject: PDC Case number 40884

Dear: Tyler Miller

Enclosed is a copy of an electronic letter sent to Kaylee Pigott, concerning the complaint filed against Secure School Choice for Washington. As noted in the letter to Kaylee Pigott, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

PDC staff is reminding you about: (1) the importance of filing timely and accurate campaign finance reports, including Monetary Contribution reports (C-3 reports), in the future in accordance with PDC laws, rules and reporting requirements for a political committee; and (2) the political advertising requirements and the importance of clearly identifying sponsorship information on all forms of advertising, including social media advertising, and using the words 'paid for by' or 'sponsored by' followed by the Committee or organization name and address.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [alice.fiman@pdcc.wa.gov](mailto:alice.fiman@pdcc.wa.gov)

Sincerely,

/s \_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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Dec. 3, 2018

Delivered electronically to " kaylee.pigott@yahoo.com"

Subject: Complaint regarding Secure School Choice for Washington, PDC Case number 40884

Dear: Kaylee Pigott

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Sept. 11, 2018. Your complaint alleged Secure School Choice for Washington violated (1) RCW 42.17A.205 by failing to timely file a Committee Registration (C-1pc report) registering with the PDC as a political committee within two weeks of making an expenditure in any election campaign; (2) RCW 42.17A.240(2) for failing to properly disclose contributions received from contributors on Monetary Contribution reports (C-3 reports); and (3) RCW 42.17A.320 for failing to identify the complete sponsor identification on political advertisements sponsored by the Committee.

PDC staff reviewed the allegations listed in your complaint, the website in question, PDC laws and rules, and the response from Tyler Miller, Secure School Choice for Washington campaign manager.

We found the following:

- Secure Schools Choice for Washington (Committee) filed a C-1pc report on March 6, 2018, registering as a 2018 election-year ballot committee in support Initiative 1621, a statewide initiative, selecting the Full Reporting Option and listing Tyler Miller as the Committee Manager and Treasurer, and the initiative sponsor.
- The Committee filed amended C-1pc reports on March 20 and 21, 2108, updating its ballot committee name to Conceal Carry on School Grounds. Initiative 1621 did not qualify for the February or November 2018 ballots.
- The Committee timely filed the following C-3 reports and Summary Full Campaign Contribution and Expenditure reports (C-4 reports): (1) on April 2, 2018, for March 2018

disclosing \$311 in contributions received and \$289 in expenditures made; (2) on May 1, 2018, for April 2018 disclosing \$202 in contributions received and \$332 in expenditures made; (3) on June 11, 2018, for May of 2018 disclosing \$3,359 in contributions received and \$2,750 in expenditures made; and (4) on July 11, 2018, for June 2018 disclosing no contributions received and \$525 in expenditures made.

- The June 2018 C-4 report was marked the “Final report” and disclosed the Committee received \$4,058 in total contributions received and \$3,925 in expenditures made.
- On July 10, 2018, the Committee filed a C-1pc report as a New Ballot Committee and disclosing that it was a 2019 election year committee to support “Expanding Choice in School Safety” on the November 5, 2019 general election ballot, selecting the Full Reporting Option and listing Tyler Miller as the Committee Manager and Treasurer. No ballot number was listed.
- Mr. Miller stated in the response that “none of the examples cited by Ms. Pigott, nor at any other time, were any financial expenditures made by Secure School Choice for Washington for the content that appeared on any of its online mediums.”
- Staff’s review of the information listed in the complaint indicated the Committee was merely posting information on its Facebook page, or merely reposting posts from other sites on its Facebook page. The contents posted on the Committee’s Facebook page did not require an expenditure of funds to distribute the information and did not meet the definition of a contribution in accordance with RCW 42.17A.005. Therefore, the Committee did not have a reporting obligation.
- Mr. Miller acknowledged that the Committee filed several C-3 reports that failed to include the complete address information as required for contributors. Mr. Miller stated that he “did not fully understand the reporting requirements in this regard” and stated the contributions were made via web-based systems, however he would be “attempting to gather this information from all donors for whom this information is missing.”
- On Nov. 9, 2018, the Committee filed four amended C-3 reports for deposits made April 10, April 30 and May 14, 2018, to include the complete address for several contributors. Mr. Miller indicated he continues to try and reach donors to gather employer information.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

PDC staff is reminding Secure School Choice for Washington and Tyler Miller about the importance of filing timely and accurately C-3 reports and C-4 reports in accordance with PDC laws, including complete contributor information, and the political advertising requirements, including the importance of clearly identifying sponsorship information on all forms of advertising, including social media advertising.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 toll-free at 1-877-601-2828, or by e-mail at [alice.fiman@pdc.wa.gov](mailto:alice.fiman@pdc.wa.gov)

Sincerely,

/s \_\_\_\_\_

Alice Fiman  
Compliance Officer

Endorsed by,

/s \_\_\_\_\_

Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
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