



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908 • (360) 753-1111
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

November 29, 2016

shane@buzzardlaw.com

Subject: PDC case 8553

Dear Mr. O'Rourke:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 3, 2016. Your complaint alleged that Katherine Gulmert may have violated RCW 42.17A.335(1)(b) by implying false incumbency in political advertising.

PDC staff reviewed your allegations, and found the following:

- When notified of the complaint the Gulmert campaign responded that an initial order of 100 yard signs was missing the word 'for', as were some business cards and a car magnet.
- The Gulmert campaign ordered new signs and updated their other campaign advertising to include the word 'for'. These new signs were placed before the November 8, 2016, General Election.
- Katherine Gulmert has no previous violations PDC laws and rules.

Based on these initial findings, I have determined that Katherine Gulmert is in substantial compliance with PDC laws and rules. Her actions to ensure compliance before the election does not amount to a material violation warranting further investigation. The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing enforcement action in this case.

If you have questions, you may contact Jacob Berkey, toll-free at 1-877-601-2828, or by e-mail at Jacob.berkey@pdcc.wa.gov.

Sincerely,

Jacob Berkey
PDC Compliance Staff

Endorsed by,

Evelyn Fielding Lopez
Executive Director

cc: Katherine Gulmert