



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

December 4, 2018

Delivered electronically to Chris Vance at "cvapv@comcast.net"

Subject: PDC Case 41274

Dear Chris Vance:

Below is a copy of an electronic letter sent to Jared C. Karstetter, Jr. concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Jared Karstetter, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning concerning your failure to file timely and accurate L-2 reports as a registered lobbyist. PDC staff expects that you will file timely and complete L-2 reports, including the disclosure of personal contributions made to Washington state candidates and political committees in the future as required by law. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,

/s _____

Peter Lavallee

Executive Director



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December 4, 2018

Delivered electronically to Jared C. Karstetter, Jr. at "karstetterlaw@gmail.com"

Subject: Complaint regarding Chris Vance, PDC Case 41274

Dear Jared Karstetter:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 8, 2018. Your complaint alleged that Chris Vance may have violated RCW 42.17A.600, .615, .255, .260 and .305 for failure to timely and accurately register as a lobbyist, report compensation and expenditures, and report independent expenditures.

PDC staff reviewed your allegations, and as a result of staff's review, we found the following:

- Chris Vance has been a registered lobbyist for the King County Corrections Guild (the Guild) at various times since 2007. His duties have included services as a political affairs consultant and lobbying. In addition, Mr. Vance routinely provides the Guild's board with a suggested list of candidates for their review who may receive contributions or endorsements from the Guild.
- On January 16, 2018, Mr. Vance submitted a Lobbyist Registration (form L-1) registering him to lobby on behalf of the Guild for the second half of the 2017/2018 biennium. As a registered lobbyist, Mr. Vance was required to disclose all personal contributions made to candidates and political committees in Washington state and any contributions delivered or transmitted on behalf of his employer or his employer's PAC.

- In his response, Mr. Vance stated that he did not believe he was responsible for reporting contributions on behalf of the Guild. On November 20, 2018, PDC staff clarified Mr. Vance's reporting requirements regarding the campaign contributions that should be reported by him as a registered lobbyist. On November 21, 2018, Mr. Vance submitted four amended Lobbyist Monthly Expense Reports (form L-2) disclosing personal contributions he made during 2016 for the months of March, April, May and September totaling \$331.07, made to republican party committees in Kittitas, Snohomish, Jefferson and Walla Walla counties. On November 20, 2018, Mr. Vance amended the May 2018 L-2 electronically to include a \$125 personal contribution he made to the 2021 Friends of Dow Constantine re-election campaign.
- RCW 42.17A.600 describes when and how to register as a lobbyist. If a lobbyist's employer is a membership organization or similar entity and the members are non-individuals, the L-1 must include a list of those members. During conversations with PDC staff on November 19 - 20, 2018, Mr. Vance confirmed that he did not lobby for the King County Corrections Guild in calendar year 2017 and that the Guild's members were individual employees of corrections facilities so no additional amendments to his L-1s were required.
- The complaint you submitted on September 8, 2018, included allegations of false statements made by Mr. Vance during testimony given to the Attorney General's Office and PDC staff regarding a case in which you were a respondent. These allegations were reviewed in connection with Mr. Vance's failure to properly report as a lobbyist.

Based on these facts, staff has determined that in this instance, failure to accurately file a small number of L-2 reports disclosing a small amount of personal contributions, does not amount to an actual material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Chris Vance will receive a formal written warning concerning failure to timely and accurately file L-2 reports as a registered lobbyist. The formal written warning will include staff's expectation that Chris Vance will file timely and complete L-2 reports, including the disclosure of personal contributions made to Washington state candidates and political committees in the future as required by law. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

PDC staff reviewed the remaining allegations concerning the false statements made by Mr. Vance during sworn testimony, his failure to timely register and accurately report as a lobbyist for the King County Corrections Guild, and the disclosure of Independent Expenditures. PDC staff found no evidence to support them beyond those specifically noted above and has dismissed those allegations in accordance with RCW 42.17A.755(1).

Based on this information, PDC staff has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Jennifer Hansen at 1-360-586-4560 toll-free at 1-877-601-2828, or by e-mail at jennifer.hansen@pdc.wa.gov.

Sincerely,

/s _____

Jennifer Hansen
Compliance Officer

Endorsed by,
/s _____
For Peter Lavalley
Executive Director

cc: Chris Vance