



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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Nov. 28, 2018

Delivered electronically to “dan@danbradylaw.com”

Subject: PDC Case 41420

Dear Dan Brady:

Below is a copy of an electronic letter sent to Jim Lazar concerning a complaint filed with the Public Disclosure Commission (PDC) against your client, the 42nd Legislative District Republican Committee (Committee).

As noted below in the letter to Mr. Lazar, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), since the Committee timely filed an amended C-4 report within 13 days of being notified about the complaint and filing error, making the necessary technical correction.

If you have questions, you may contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail pdc@pdc.wa.gov.

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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Delivered electronically to “jim@jimlazar.com”

Subject: Complaint regarding 42nd Legislative District Committee GOP, PDC Case 41420

Dear: Jim Lazar

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed Aug. 31, 2018 against the 42nd Legislative District Republican Committee GOP (Committee), a bona fide county political party organization registered with the PDC.

The complaint alleged that the Committee violated RCW 42.17A.240 and WAC 390-16-037 by failing to provide a detailed description of an expenditure made to Print and Copy Factory on a Campaign Summary Receipts and Expenditure reports (C-4 report) filed on September 10, 2018.

PDC staff reviewed the allegation listed in the complaint, the statutes, rules, and reporting requirements, the C-4 reports filed by the Committee, and the response from Dan Brady, of Dan Brady Law, legal counsel for the Committee.

Based on staff’s review, we found the following:

- The Committee filed a new Committee Registration (C1-PC) on June 28, 2018, selecting the Full Reporting Option, identifying as an ongoing, exempt bona fide political party committee, and listing Charlie Crabtree as campaign manager and Eileen Sobjack as campaign treasurer.
- On Sept. 10, 2018, the Committee timely filed the August 2018 C-4 report disclosing a \$3,942 expenditure made on August 7, 2018, to Print and Copy Factory, and listing the purpose and/or description as “Mail piece: Support VanWerven/Ericksen/Buys.”
- On October 8, 2018, PDC staff informed the Committee about the complaint and provided copies of the complaint and exhibits to Mr. Crabtree.

- On October 16, 2018, the Committee timely filed the 21-Day Pre-General Election C-4 report disclosing the receipt of \$79,150 in total monetary and in-kind contributions and \$18,453 in expenditures made.
- On October 21, 2018, the Committee filed an amended C-4 for August 2018 (#100867638), providing additional details for the \$3,941.53 expenditure made to Print and Copy Factory, listing 15,000 pieces. Please note the data may not be available on the C-4 listed on the PDC's public website since the expenditure fields of the Online Reporting of Campaign Activities (ORCA), PDC Campaign finance software is character limited, so if a larger amount of characters is entered into that field, the full description entered does not appear on the form.
- On October 22, 2018, Mr. Brady questioned whether the rule (WAC 390-16-037) specifically required that "level of detail in disclosure of political advertising by mail. In addition, at the time of mailings, there was no PDC guidance on its website requiring this level of detail and notably not on the "Expenditures that Require Additional Disclosure" page of the Instructions. The Committee is aware that this (web)page had been updated since the mailings were produced requesting that level of detail for "printing."

Based on these initial findings, staff has determined that in this instance, the Committee's failure to provide a detailed description for one expenditure does not amount to a material violation warranting further investigation.

The 42nd Legislative District Republican Committee made a minor error in providing the description for one expenditure that was timely disclosed on the initial C-4 report. The Committee timely filed an amended C-4 report disclosing the information within 13 days of being notified about the complaint and filing error, making the necessary technical correction. The late filed information did not materially impact the public interest.

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

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

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

Barbara Sandahl
Deputy Director

For Peter Lavallee
Executive Director