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October 22, 2018

VIA EMAIL ONLY

Micaiah Titus Ragins
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

RE: PDC Case No. 41420, 42nd Legislative District Committee GOP

Dear Micaiah Titus Ragins:

I am replying on behalf of the 42nd Legislative District Committee GOP (the "Committee") to your email of October 8, 2018 requesting a response to a complaint filed by James Lazar alleging a violation of WAC 390-17-037.

The complaint suggests that the Committee's September 10, 2018 C-4 filing with the PDC did not provide enough detail when it disclosed an August 7, 2018 payment to Print & Copy Factory and an August 24, 2018 payment to Print NW.

WAC 390-16-037 does not require a specific 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 page had been updated since the mailings were produced requesting that level of detail for "printing".

It is also important to note that the Committee did actually describe in great detail the purpose of the expenses, noting specifically that it was a mailing designed to support specific candidates even though space limitations exist for entering such detailed information.

Finally, while the Committee does not believe this level is detailed is required, in the interest of full public disclosure it has amended it's September 10, 2018 C-4 to indicate the number of pieces printed at Print & Copy Factory.

I hope you find this information useful. Please contact me if I can provide further information, and I look forward to your response.

Sincerely,



Dan Brady, WSBA #33731