



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

January 2, 2019

Sent electronically to Robin Ball at [robin@sharpshooting.net](mailto:robin@sharpshooting.net) and to Donna O'Leary at [bunco1@comcast.net](mailto:bunco1@comcast.net)

Subject: Spokane County Republican Central Committee, PDC Case 41756

Robin Ball and Donna O'Leary:

Below is a copy of an electronic letter sent to Alex Brooks concerning a complaint he filed with the Public Disclosure Commission (PDC) on October 8, 2018. The complaint alleged that the Spokane County Republican Central Committee (SCRCC), and Donna O'Leary, an individual, may have violated RCW 42.17A.320 by failing to include sponsor identification (paid-for-by information), party affiliation, and correct text formatting for two candidate "meet and greet" meetings, one held in 2016 and one in 2018.

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

However, PDC staff is reminding the committee and its members, including Donna O'Leary, of the importance of including, in political advertising, the party affiliation of candidates for state or local office who have expressed a party preference on their Declaration of Candidacy (a declaration form filed with the Secretary of State during filing week), and sponsor identification (paid-for-by information) in future years in accordance with PDC laws and rules. The "meet and greet" materials and invitations qualify as political advertising.

Accordingly, the PDC has dismissed this complaint in accordance with RCW 42.17A.755(1)(a).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov).

Sincerely,

Endorsed by:

Erick Agina  
PDC Compliance Officer

BG Sandahl, Deputy Director for  
Peter Lavalley, Executive Director





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January 2, 2019

Sent electronically to Alex Brooks at [alexbgood27@gmail.com](mailto:alexbgood27@gmail.com)

Subject: Spokane County Republican Central Committee, PDC Case 41756

Dear Mr. Brooks:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 8, 2018. The complaint alleged that the Spokane County Republican Central Committee (SCRCC), and Donna O’Leary, an individual who is active in the SCRCC, may have violated RCW 42.17A.320 by failing to include sponsor identification (paid-for-by information), party affiliation, and correct text formatting in its political advertising that was for two “meet and greet the candidates” meetings, one held in 2016 and one in 2018.

PDC staff reviewed the allegations listed in the complaint to determine whether a formal investigation or enforcement action is warranted. Staff reviewed all the exhibits submitted with the complaint, and the November 7, 2018 response letter received via email from Robin Ball with the SCRCC. Based on staff’s review, we found the following:

On January 5, 2015, the SCRCC filed a C-1pc report disclosing it was a continuing “Bona Fide” political committee, selecting the Full Reporting Option, and listing Dave Moore and Tianna Abel as campaign manager and treasurer respectively.

Allegations One and Four: Failure to include sponsor identification on political advertising and failure to identify who paid for the ad.

- Even though Ms. O’Leary is involved with the SCRCC as a leader in the community, the SCRCC did not sponsor or pay for the ad inviting candidates to the October 2018 “meet and greet the candidates” event.
- The committee, by way of chairperson Robin Ball, stated the “ad in question was arranged, sponsored, and paid for by Donna O’Leary and was not an event sponsored by the local party.” Ms. Ball furnished the PDC with a receipt showing that Donna O’Leary paid for the October 2018 ads.
- The ads for the 2018 event were arranged, sponsored and paid for solely by Donna O’Leary without the SCRCC’s involvement. Ms. O’Leary failed to include the words “Sponsored by” or “Paid for by” followed by her name and address as required by RCW 42.17A.320.

Allegation Two: Failure to identify party affiliation on political ads.

- The “meet and greet the candidates” event in 2016 was organized by the Spokane County Republican Party (SCRCC) and was included on its website, resulting in a presumption that the party affiliation of the candidates listed is the same as that of the party. The invitation for the second “meet and greet the candidates” event, held October 20, 2018, appeared in *The Splash* and *The Current*. Both listed Donna O’Leary as the contact person, but did not explicitly state that Ms. O’Leary had paid for the ad or include the party preference, when required, for the candidates listed in the ad.

Allegation Three: Failure to use correct text formatting and size for ads.

- The SCRCC was not responsible for the 2018 ad since it was paid for by Donna O’Leary, without the involvement of the SCRCC.

While the 2018 ad organized and paid for by Donna O’Leary failed to include the paid-for-by and party preference information, PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaint or pursuing enforcement action in this instance.

Although PDC will not be conducting a formal investigation into these allegations or taking further enforcement action in this matter, staff has reminded the SCRCC and its district leader, Donna O’Leary, of the expectation and importance of including required Sponsor Identification and Party Preference information in political advertising so the public can identify who paid for

the political advertising, and when required, the party preference of candidates featured in the advertising, in future years, as required by the PDC laws and rules

Based on the above, the PDC has dismissed your complaint in accordance with RCW 42.17A.755(1).

If you have questions, you may contact me at (360) 586-2869, toll-free at 1-877-601-2828, or by e-mail at [erick.agina@pdc.wa.gov](mailto:erick.agina@pdc.wa.gov).

Sincerely,

Endorsed by:

Erick Agina  
PDC Compliance Officer

BG Sandahl, Deputy Director for  
Peter Lavalley, Executive Director

cc: Spokane County Republican Central Committee, Donna O'Leary, 4<sup>th</sup> District Leader.

