

PDC - Washington Realtors Political Action Committee: Alleged Violation of RCW 42.17A.320, .435 for failure to disclose the top contributor, sponsor identification, and source of contributions. (OCT 2018)

Mark Lamb

To

pdc@pdc.wa.gov

Cc:

mark@northcreeklaw.com

(Wed, 5 Dec 2018 at 7:19 PM)

Mr. Ragins,

Please accept this response on behalf of the Washington Realtors Political Action Committee (“RPAC”) to the complaint of Ms. Susan Peters dated October 31, 2018.

The complaint makes two primary allegations: 1.) that two RPAC mailings failed to identify a top five donor in potential violation of RCW 42.17A.320, and 2.) digital ads supporting Jesse Salomon listed a nonexistent PAC as sponsor.

1. RPAC Accurately Listed the Top Five Donors at the Time the Pieces in the complaint were Created

RPAC was informed on Thursday, October 25, 2018 of the in kind contributions amount referenced in the complaint and amended its C-4 to reflect it that very day. The first mail piece mentioned in the complaint (“Ethics”) appeared to the public on October 19-20, 2018. The second mail piece in the complaint (“Two Kids”) was approved on October 20, 2018 and then went to print and post office. Because the two pieces listed in the complaint had already been approved, printed and sent to the post office well before my client was notified of the in-kind amounts my client did not violate RCW 42.17A.320 with respect to the pieces in this complaint. My client accurately listed the top five contributors at the time of production of these two pieces and updated its reporting to the PDC immediately when the top five donors changed consistent with the requirements of RCW 42.17A.320.

2. RPAC Did not Place the Digital ads Supporting Jesse Salomon

RPAC did not place the digital ads referenced in the second part of Ms. Peters complaint, thus no additional response from my client is required.

I believe this addresses all questions related to your correspondence with Ms. Clarke, but feel free to reach out to me directly if you have additional questions.

Thank you.

Best,



Mark Lamb

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