



**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 • Website: www.pdc.wa.gov

March 13, 2019

Delivered electronically to dawgperry@gmail.com and davidadams_56@yahoo.com

Subject: Complaint filed by Dave Churchman, PDC Case 44956

Dear Tom Perry:

Enclosed is a copy of an electronic letter sent to Dave Churchman concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Dave Churchman, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

If you have questions, contact Alice Fiman at 1-360-586-4746 or toll-free at 1-877-601-2828, or by e-mail alice.fiman@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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March 13, 2019

Delivered electronically to davechurchman@icloud.com

Subject: Complaint regarding Reachout Northwest, PDC Case 44956

Dear Dave Churchman:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed January 3, 2019. Your complaint alleged that Reachout Northwest may have violated RCW 42.17A.205 by failing to timely register as a political committee within two weeks of the expectation of contributions and expenditures in support of a ballot proposition and RCW 42.17A.235 for failing to timely report contributions and expenditures as a political committee under the Full Reporting option.

PDC staff reviewed your allegations; the applicable statutes, rules and reporting requirements, and the response provided by David McMullen, Registered Agent, Reachout Northwest and Tom Perry, Treasurer Reachout Washington.

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

- Reachout Northwest in not registered as a political committee with the Public Disclosure Commission.
- In his response, McMullen stated "Reachout Northwest is a non-profit as filed with the Washington State Secretary of State on July 31, 2018 and is also a 501(c)(4) organization. Reachout Northwest is currently obtaining a federal tax identification number for furthering its status as a 501(c)(4) organization. Although Reachout Northwest has a bank account, the monies collected or disbursed would be used for only purposes consistent with the 501(c)(4) status. (See U.S.C. § 501.) No one has/had official authorization to use the words 'This petition is paid for by Reachout Northwest' on the initiative petition identified by the complainant. Reachout Northwest has not collected or disbursed any monies regarding any initiative petition or campaign, including the initiative petition that is the subject of this complaint. Reachout Northwest has not paid

for the printing or distribution of any initiative petition, including the petition listed in the complaint.”

- McMullen also stated “The organization named on the initiative petition, Reachout Northwest, has not paid for or provided any financial support to this, or any other initiative petition. Nor did Reachout Northwest officially authorize the use of its name on any petition, including the petition that is the subject of this complaint.”
- A political committee is registered with the PDC under the name Reachout Washington. The committee filed a C1-PC on January 3, 2019 and an updated C1-PC on February 13, 2019, listing David Adams as campaign manager and Tom Perry as treasurer.
- Perry responded to the complaint, stating “ReachOut Northwest and ReachOut Washington do have some members in common. But ReachOut Northwest is not involved in any electioneering activity. It is purely an organization that shares information and opinions on public policy in general. Regarding the complaint about ReachOut NW paying for petition printing, ReachOut NW has not collected or disbursed any monies regarding any initiative petition or campaign, including the initiative petition that is the subject of this complaint. There was a misunderstanding by the man who printed the petitions, David Prutzman. At no time was there any agreement between Mr. Prutzman and ReachOut NW that ReachOut NW was sponsoring this effort or were paying for any printing.”
- Although filing under the full reporting option, Reachout Washington has not report contributions and expenditures.
- Perry stated “No reports have been filed because there hasn’t been any financial activity yet. Once that happens we will file reports according to the schedule when necessary.”

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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

Sincerely,

/s _____

Alice Fiman
Compliance Officer

Endorsed by,

/s _____

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