



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

March 26, 2019

Delivered electronically to “cbgarstdems@gmail.com”

Subject: Complaint filed by Andrew Saturn, PDC Case 47222

Dear Thurston County Democratic Women:

Below is a copy of an electronic letter sent to Andrew Saturn concerning a complaint filed with the Public Disclosure Commission (PDC).

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

PDC staff is reminding you about the importance of timely registering in each calendar year to utilize the mini-reporting option. PDC staff expects in the future that you will familiarize yourselves with the rules around mini-reporting contained in WAC 390-16-105 through WAC 390-16-125 to ensure consistent and timely compliance with PDC statutes and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s

\_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

\_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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March 26, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding Thurston County Democratic Women, PDC Case 47222

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on February 15, 2019. Your complaint alleged that the Thurston County Democratic Women, a continuing political committee, may have violated RCW 42.17A.205 for failure to re-register on an annual basis to maintain mini-reporting status in 2019; WAC 390-16-125 for exceeding mini-reporting limitations without written approval from the PDC in 2018; and RCW 42.17A.235 for failure to timely and accurately file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign after exceeding mini-reporting limitations in 2018 and failure to re-register as a mini-reporting committee in 2019.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Thurston County Democratic Women; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- The Thurston County Democratic Women is a political committee which has been registered under the mini-reporting option provided by WAC 390-16-105 through WAC 390-16-125, which allows a committee to not file C-3 and C-4 reports provided they adhere to a series of requirements such as allowing inspection of books before an election, accepting no more than \$500 from any single contributor, and raising and spending no more than \$5,000 during a calendar year. WAC 390-16-105.
- The mini-reporting option requires a continuing political committee to file a new Political Committee Registration (C-1pc), "*between January 1st and January 31st for each year in which the committee intends to use the mini reporting system. Failure to file a new registration during January will automatically terminate the committee's entitlement to use the mini reporting system until such time as a new C-1pc is filed.*" WAC 390-16-115.
- The Thurston County Democratic Women failed to submit a C-1pc as required by WAC 390-16-115, and their mini-reporting status was terminated until such time as a new C-1pc was filed.

- The Thurston County Democratic Women filed a C-1pc on February 27, 2019, selecting the mini-reporting option.
- The Complaint contained a treasurer's report from July-August 2018 that provided no evidence to support the allegation that the Thurston County Democratic Women raised and spent more than \$5,000 in a calendar year, nor to support the allegation that they received and retained any contribution from a single contributor exceeding \$500 in the aggregate.
- The Thurston County Democratic Women attest that they did not raise or spend more than \$5,000 in 2018, and that they did not receive and retain any contribution from a single contributor exceeding \$500 in the aggregate.
- The Thurston County Democratic Women have no prior found violations of PDC laws or rules.

Based on these findings staff has determined that, in this instance, failure to timely file a C-1pc to select the mini-reporting option for calendar year 2019 does not amount to an actual violation warranting further investigation.

PDC staff is reminding the Thurston County Democratic Women about the importance of timely registering in each calendar year to utilize the mini-reporting option. Staff expects that the Thurston County Democratic Women will familiarize themselves with the rules around mini-reporting contained in WAC 390-16-105 through WAC 390-16-125 to ensure consistent and timely compliance with PDC statutes and rules.

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, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director

cc: Thurston County Democratic Women