

withholdings of wages for contributions, Sensa Salon informed her that the employees donated their time and no wages or tips were received.

- 2.3 Ms. Faust's complaint also included additional allegations that Washington United for Marriage unlawfully began receiving contributions prior to filing its political committee registration form with the PDC (form C-1pc) in February, 2012, but she later withdrew that allegation upon learning that the committee had been previously registered before February. **(Exhibit 1, p. 5)**.

III. FINDINGS

- 3.1 On Sunday, September 9, 2012, Sensa Salon held an event in which participants could have their hair cut (or receive other salon services) and pay for the cost of their service by making a contribution to Washington United for Marriage.
- 3.2 The event was promoted on the salon's Facebook page. **(Exhibit 2)** Washington United for Marriage encouraged people to attend the event via Twitter. **(Exhibit 3)**
- 3.3 Employees of Sensa Salon organized the event and received permission from the salon's owner to hold the event at the salon on a day the salon is normally closed. The salon owner had no previous experience with political fundraising and was not present at the event.
- 3.4 Two Sensa Salon employees staffed the event. The employees volunteered their time and did not receive any compensation from Sensa Salon for working during the event. Employees did not accept or receive any tips for service.
- 3.5 No one from Washington United for Marriage was present at the event. The committee provided pre-printed contribution envelopes and a larger return envelope in which all of the used and unused pre-printed contribution envelopes could be returned back to the committee.
- 3.6 Two individuals attended the hair-cut fundraiser. Salon staff stated that, based on the services provided, less than \$500 was received from the two customers. The two attendees completed the information requested on the committee's pre-printed contribution envelopes and either included a check or provided their credit card information. No money was run through the salon's cash register nor was a credit card processed at the salon for this event. Sensa Salon employees placed the pre-printed contribution envelopes in the larger envelope provided by Washington United for Marriage and mailed it to the committee.
- 3.7 Washington United for Marriage stated that they did not have any donation records specific to the Sensa Salon fundraiser and if they received donations from this event they were entered as "uncoded" donations, meaning that they were not connected to a specific event or solicitation.

- 3.8 The owner of Sensa Salon stated that the two Sensa Salon employees who volunteered their time at the fundraiser were not paid wages, and no portion of any wages was withheld from employees' wages or transferred to Washington United for Marriage.

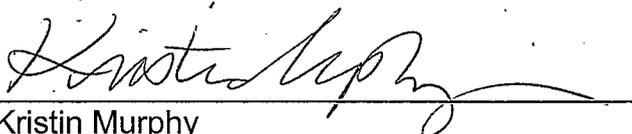
IV.
SCOPE

- 4.1 Staff reviewed the complaint filed by Rebecca Faust, including the amendment withdrawing one allegation.
- 4.2 Staff communicated with Sensa Salon staff and owner.
- 4.3 Staff communicated with Washington United for Marriage staff.

V.
LAW

- 5.1 **RCW 42.17A.470** provides that a person, other than an individual, may not be an intermediary or an agent for a contribution. It further provides that an individual may not make a contribution on behalf of another person or entity, or while acting as the intermediary or agent of another person or entity, without disclosing to the recipient of the contribution both his or her full name, street address, occupation, name of employer, if any, or place of business if self-employed, and the same information for each contributor for whom the individual serves as intermediary or agent.
- 5.2 **RCW 42.17A.495** states, in part, (1) No employer may increase the salary of an employee, or compensate an employee or other person or entity, with the intention that the increase in salary, or the compensation, or a part of it, be contributed or spent to support or oppose a candidate, political party, or political committee. It further provides that: (3) No employer or other person or entity responsible for the disbursement of funds in payment of wages or salaries may withhold or divert a portion of an employee's wages or salaries for contributions to political committees or for use as political contributions except upon the written request of the employee; and (4) Each person or entity who withholds contributions under subsection (3) shall maintain open for public inspection for a period of no less than three years, during normal business hours, documents and books of accounts that shall include a copy of each employee's request, the amounts and dates funds were actually withheld, and the amounts and dates funds were transferred to a political committee.

Respectfully submitted this 16th day of October, 2012.



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Political Finance Specialist

EXHIBIT LIST

- EXHIBIT 1 . Complaint filed by Rebecca Faust on September 13, 2012, including later amendment withdrawing allegation against Washington United for Marriage.
- EXHIBIT 2 Sensa's Facebook post for September 9, 2012 hair cut fundraiser.
- EXHIBIT 3 WUFM's Twitter post about Sensa's September 9, 2012 event.