

**BEFORE THE PUBLIC DISCLOSURE COMMISSION  
OF THE STATE OF WASHINGTON**

IN THE MATTER OF ENFORCEMENT  
ACTION AGAINST:

Citizens for Two-Thirds

Respondent

PDC CASE NO. 13-101

FINAL ORDER

This matter came before the Washington State Public Disclosure Commission (PDC) on September 10, 2013 at the PDC Office, 711 Capitol Way, Room 206, Olympia, Washington.

Those present included Amit Ranade, Commission Chair; and participating by telephone, Grant Degginger, Vice-Chair; and Kathy Turner, Member. Also present were: Dan Brady, attorney on behalf of Respondent; Phil Stutzman, PDC Director of Compliance on behalf of the PDC Staff; PDC Executive Director Andrea McNamara Doyle; Nancy Krier, General Counsel for the Commission.<sup>1</sup> PDC staff member Nancy Coverdell was present as recorder/reporter of the proceedings. The proceedings were open to the public and recorded.

Respondent Citizens for Two-Thirds (CTT) is a political committee formed to support Proposition 1, a ballot proposition in the November 5, 2013 general election in the City of Yakima. Ben Shoal is the committee's treasurer and Bruce Smith is its secretary. This matter resulted from allegations that the Respondent violated RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, and WAC 390-16-125 by exceeding the limits of the Mini Reporting option, and by failing to properly change to the Full Reporting option before exceeding the limits of the Mini Reporting option.

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<sup>1</sup> Also present for the purpose of addressing a Motion to Intervene were Robert Shirley, attorney for Jim Lazar (proposed intervenor); and Linda Dalton, Sr. Assistant Attorney General, attorney on behalf of PDC Staff. The Chair denied the motion. See Order Denying Motion to Intervene, PDC Case 13-101.

PDC Staff submitted to the Commission a Report of Investigation (with exhibits) dated August 29, 2013 from Tony Perkins, PDC Lead Political Finance Specialist.

**Proposed Stipulation**

The parties jointly submitted a proposed Stipulation as to Facts, Violations, and Penalty (Stipulation) signed by Mr. Brady, on August 21, 2013, and by Ms. Doyle on August 29, 2013. The Stipulation was provided to the Commission with a memo from Phil Stutzman dated September 4, 2013 and a summary of comparable cases.

The parties made oral presentations. The parties requested the Commission to accept the Stipulation. The Commission voted 3-0 to accept the Stipulation, which included assessing a \$500 penalty.

**I. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Based upon the Stipulation, which is hereby attached and incorporated by reference, the Commission finds and concludes:

1. The Jurisdiction, Facts, Legal Authority, and Violations are established as provided in the Stipulation.
2. A \$500 penalty is an appropriate resolution of the matter.

**II. ORDER**

Based upon the findings and conclusions, the Commission orders that:

1. The Stipulation is accepted.
2. The Respondent is assessed a civil penalty of \$500.

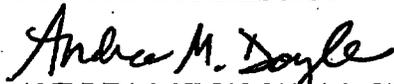
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The Executive Director is authorized to enter this order on behalf of the Commission.

So ORDERED this 26<sup>th</sup> day of September, 2013.

WASHINGTON STATE PUBLIC  
DISCLOSURE COMMISSION  
FOR THE COMMISSION:

  
ANDREA MCNAMARA DOYLE  
Executive Director

**ATTACHMENTS**

- (1) Stipulation as to Facts, Violations, and Penalty (signed by Respondent's counsel on August 21, 2013, and by PDC staff on August 29, 2013)
- (2) Appeals and Enforcement of Final Orders

*Copy of this Final Order to:*

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