



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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TO: Commissioners
FROM: *Philip E. Stutzman*
Philip E. Stutzman, Director of Compliance
DATE: June 23, 2014
SUBJECT: Yes on I-522, Case No. 14-011

This case concerns allegations that were made in a 45-day citizen action notice filed with the Attorney General on October 25, 2013, by Rob Maguire, an attorney with Davis, Wright, Tremaine, PLLC, a Seattle law firm, against Yes on I-522 Committee, PDC Case No. 14-011. On October 28, 2013, the Attorney General referred the Complaint against Yes on I-522 Committee to the PDC for investigation and possible action. On December 19, 2013, staff opened a formal investigation into these allegations.¹

The Complaint alleged that Yes on I-522 Committee violated RCW 42.17A.235 and .240 by failing to timely disclose on Campaign Summary Receipts & Expenditures reports (C-4 reports) the receipt of in-kind contributions for political advertisements and staff services in support of I-522, a statewide initiative concerning the labeling of genetically modified foods and beverages on the November 5, 2013 general election ballot in Washington State.

An enforcement hearing is scheduled for the June 26, 2014 Commission meeting for Yes on I-522 Committee. The meeting materials contained a copy of staff's Report of Investigation and Exhibits, and a Notice of Administrative Charges. The parties have reached a Stipulation as to Facts, Violations and Penalty, a copy of which is attached with this memo and will be presented for your consideration in lieu of a formal enforcement hearing at the June 26 meeting. Also enclosed with this memo is a list of comparable cases prepared by staff as well as a document prepared by the Yes on I-522 Committee. The parties recommend that the Commission accept the Stipulation as an appropriate resolution of the late-reporting.

Once the Commission has acted on this enforcement matter, staff will ask that the Commission make a report back to the Attorney General concerning the Complaint received from his office.

Enclosures: (1) Comparable cases; (2) Supplemental Memo – Yes on I-522 Committee

c: Linda Dalton, Senior Assistant Attorney General
Jim Frush, Counsel for the Yes on I-522 Committee

¹ The Complaint also contained allegations against other entities. Those allegations are being separately investigated and have or will be presented to the Commission separately as they are completed.