



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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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)

September 11, 2018

Delivered electronically to “dawgperry@gmail.com”

Subject: PDC Case 38096

Dear Tom Perry:

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

As noted below to Mary Brown, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

WA Forward made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of noncompliance, the Campaign timely amended the reports and made the necessary technical corrections.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_

Micaiah Ragins  
Compliance Coordinator

Endorsed by,

/s\_\_\_\_\_

Barbara Sandahl

Deputy Director

For Peter Lavallee

Executive Director



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September 11, 2018

Delivered electronically to "browngh@aol.com"

Subject: Complaint regarding WA Forward, PDC Case 38096

Dear Mary D. Brown:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on July 20, 2018. Your complaint alleged that WA Forward may have violated RCW 42.17A.240 for failure to accurately disclose address information for vendors on the C-4 report.

PDC staff reviewed your allegations, and as a result of staff's initial review, we found the following:

- On July 17, 2018, the Campaign filed a Summary Full Campaign Contributions and Expenditures (C-4 Report) for the 2018 election, disclosing \$287,014.95 in expenditures for political advertising through vendors listed as Strategic Media Services and DMM Media (Report# 100845645).
- The C-4 report lists a vendor address that is not consistent for each entry. PDC Staff verified that the state abbreviation for multiple expenditures fluctuates between "WA" and VA." The street address, city name, and zip code for the vendor address remains correct and unchanged. The street address is listed as "1911 N Fort Myer Dr Ste 400", the city is Arlington, and the zip code is 22209; only the state abbreviation is inconsistent and inaccurate.
- The treasurer for the Campaign explained in the response that the ORCA software automatically carries over the city and zip code field to the next entry. The Campaign

acknowledged that they failed to notice the change between "VA" and "WA" since the two abbreviations look very similar. PDC staff confirmed that the error resulted from the Campaign mistakenly selecting "WA" during one of the expenditure entries, which then became the automatic default for the subsequent entries.

- The treasurer said that they have corrected the report to designate Virginia as the state for the vendor address instead of Washington. PDC Staff confirmed that the amended C-4 (Report# 100846547) was filed on July 23, 2018 and that the designated state abbreviation has been correctly changed from "WA" to "VA."

Based on these initial findings, staff has determined that in this instance, the failure to provide accurate address information for expenditures does not amount to a material violation warranting further investigation. WA Forward made minor or ministerial errors on required reports, which did not materially impact the public interest. Upon notification of noncompliance, the Campaign timely amended their reports, making the necessary technical corrections within 24 hours of receiving the complaint.

The PDC has closed the matter, and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case. If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [micaiah.ragins@pdc.wa.gov](mailto:micaiah.ragins@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Micaiah Ragins  
Compliance Coordinator

Endorsed by,

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

cc: WA Forward