



**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.pdcc.wa.gov](http://www.pdcc.wa.gov)**

August 30, 2018

Delivered electronically to "davidrgellatly@gmail.com"

Subject: PDC Case 39112

Dear Clark Leadership:

Below is a copy of an electronic letter sent to Dan Clark, et al. concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Dan Clark, et al., the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

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 [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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August 30, 2018

Delivered electronically to “dfredc@gmail.com”, “kevinvangelder@live.com”, “frankedecker@gmail.com”, “kalupv@gmail.com”, and “rlcgrn@gmail.com”.

Subject: Complaint regarding Clark Leadership PAC, PDC Case 39112

Dear Daniel Clark, Kevin VanGelder, Frank Decker, Kalup Veneman, and Richard Colwell :

The Public Disclosure Commission (PDC) has completed its initial review of the complaints you filed between August 17 and August 14, 2018. Your complaints alleged that Clark Leadership PAC may have violated RCW 42.17A.235 and Emergency Rule WAC 390-16-043 for failure to properly allow for inspection of books of account.

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

- While the parties requested a time outside the statutorily mandated period, officers for Clark Leadership PAC agreed to the time and location, and arrived at substantially the agreed upon time for the records inspection.
- At the records inspection, officers for Clark Leadership PAC presented record of \$70 worth of financial activity that had occurred since the PAC's inception. No record of activity shows participation in an election, nor does activity rise above the reporting threshold of RCW 42.17A.235.
- Officers for Clark Leadership complied with their obligations for book inspection under RCW 42.17A.235 and Emergency Rule 390-16-043.

Based on these initial findings, staff has determined that in this instance, no evidence supports a finding of a material violation warranting further investigation. 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail 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 Lavalley

Executive Director

cc: Clark Leadership PAC