



**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: pdc@pdc.wa.gov • Website: www.pdc.wa.gov

May 17, 2018

Delivered electronically to “lynnemariee@gmail.com”

Subject: PDC Case 27056

Dear Burien For All:

Enclosed is a copy of a letter sent to Chestine Edgar concerning a complaint filed with the Public Disclosure Commission (PDC) on October 27, 2017. RCW 42.17A.235 for failure to timely report contributions and expenditures, and RCW 42.17A.335 for false statements of endorsement defaming Burien candidates. A copy of the complaint was previously sent to you.

As noted in the letter to Chestine Edgar, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter. However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to timely file reports of contributions and expenditures. PDC staff expects that you will file timely and complete reports of contributions and expenditures in future years in accordance with PDC laws and rules.

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 fox.blackhorn@pdc.wa.gov.

Sincerely,

Fox Blackhorn
Compliance Coordinator

Endorsed by,

Peter Lavallee
Executive Director

Enclosure: Letter to Chestine Edgar



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May 17, 2018

Delivered electronically to “16collingham@gmail.com”

Subject: Complaint regarding Burien For All, PDC Case 27056

Dear Chestine Edgar:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on October 27, 2017. Your complaint alleged that Burien For All may have violated RCW 42.17A.235 for failure to timely report contributions and expenditures, and RCW 42.17A.335 for false statements of endorsement defaming Burien candidates.

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

- Burien For All filed a C-1pc committee registration on 8/12/17, and failed to report contributions and expenditure activity prior to registration on the date the C-1pc was filed, in violation of RCW 42.17A.235.
- Burien For All failed to timely file C-3 and C-4 reports from 8/12/17 to 9/25/17, and failed to timely file their 21-day pre-general C-4 by 10/17/17, and failed to timely file their C-4 report for the month of December, due on 1/10/18, in violation of RCW 42.17A.235.
- Burien For All mailed political advertising with falsely attributed quotes of endorsement from President Donald Trump, yet provided a clear disclaimer that no endorsement had occurred and the quotes were fictitious.
- As such, the political advertising could not be found to have been sponsored with actual malice in violation of RCW 42.17A.335. Actual malice is defined by RCW 42.17A.005(1) as actions undertaken with, “*knowledge of falsity or with reckless disregard as to truth or falsity.*”

Based on these initial findings, staff has determined that in this instance, failure to timely file reports of contributions and expenditures does not a material violation warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Burien For All will receive a formal written warning concerning their failure to timely file reports of contributions and expenditures. The formal written warning will include staff's expectation that Burien For All files timely and complete reports of contributions and expenditures in future years in accordance with PDC laws and rules. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

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 fox.blackhorn@pdc.wa.gov.

Sincerely,



Fox Blackhorn
Compliance Coordinator

Endorsed by,



Peter Lavallee
Executive Director

Enclosure: Letter to Chestine Edgar