



**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 • Website: www.pdcc.wa.gov

April 3, 2019

Delivered electronically to "barbara@barbaramarney.com" and "taki.flevaris@pacificallawgroup.com"

Subject: PDC Case 46514

Dear Yes for Public Safety:

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

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

PDC staff is reminding you about the importance of timely and accurately disclosing the Top 5 Contributors on all political advertising. PDC staff expects that you will fully disclose Top 5 Contributors in future years in accordance with PDC laws and rules.

If you have questions, you may contact Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdcc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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April 3, 2019

Delivered electronically to "glen@wethegoverned.com"

Subject: Complaint regarding Yes for Public Safety PAC, PDC Case 46514

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 30, 2019. Your complaint alleged that Yes for Public Safety (the "Respondent") may have violated RCW 42.17A.320 by failing to accurately disclose the Top 5 Contributors on political advertising (a Proposition 1 mailer).

PDC staff reviewed your allegations and, as a result, found the following:

- In December of 2018, the Spokane City Council voted in favor of forwarding Proposition 1 – a property tax levy designed to fund emergency services and crime reduction – to voters for their consideration at a February 12, 2019 Special Election.
- Yes for Public Safety, a single-year ballot committee, sponsored an ad supporting Proposition 1 that was mailed out on January 25, 2019. The cost of the mailer was approximately \$5,200 and the expenditure was timely and accurately reported by the committee to the PDC (see C-4 report 100883393).
- McDaniel Projects, a sole proprietorship, made an in-kind contribution to the Respondent on January 16, 2019. The amount of the in-kind contribution was \$1,000 and it was timely and accurately reported by the committee to the PDC (see C-4 report 100882020).
- Pursuant to RCW 42.17A.320, a political committee that sponsors an ad must disclose the "Top Five Contributors" and the names of the five persons or entities making the largest contributions or more than \$700 during the twelve-month period preceding the date of the advertisement.
- The Respondent identified two organizations – Spokane Firefighters Local 29 and Spokane Police Guild – as the "Top 5 contributors" on its Proposition 1 mailer but failed to disclose a third contributor, McDaniel Projects.
- After it became aware of the omission, the Respondent made a good-faith effort to remedy the error by including McDaniel Projects as a Top Five Contributor on its subsequent

advertising materials, including another mailer that was sent to a broader, overlapping audience.

Based on these findings, staff has determined that, in this instance, failure to disclose a Top 5 Contributor on a ballot proposition support ad does not amount to an actual violation warranting further investigation.

PDC staff is reminding Yes for Public Safety about the importance of timely and accurately disclosing the Top 5 Contributors on all political advertising.

The PDC has dismissed 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 Tabatha Blacksmith at 360-586-8929, toll-free at 1-877-601-2828 or by e-mail pdcc@pdc.wa.gov

Sincerely,

/s _____
Tabatha Blacksmith
Compliance Coordinator

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

cc: Yes for Public Safety PAC