

August 6, 2019

Washington Public Disclosure Commission
Mx. Fox Blackhorn
Compliance Coordinator 2

RE: Case 55265

Thank you for your communication dated July 26, 2019 and taking time to better explain the nature of the complaint.

As you suggested, WAC 390-18 and RCW 42.17A were reviewed.

The key operative is whether the referenced email is *or* is not political advertising. The email in question is not political advertising nor was it intended to be.

The referenced email dated July 12, 2019 was a privileged communication between Preserve Reasonable Shoreline Management (PRSM) and its supporters (Please refer to the email footnote). It was not a broadcast email. This is normal communication with PRSM supporters and has been going on for years. Its purpose is to inform PRSM supporters of news and current events. Since the topic involves the City of Bainbridge Island and the Department of Ecology, it necessarily cites people, places and events relevant the purpose of PRSM. PRSM is not a PAC

The email did not endorse any candidate nor did it specify opposition to a candidate. In fact, there is a general statement at the introduction reminding people that there is an upcoming election with three candidates running. It refers to the Washington State Voter Pamphlet so the reader could decide.

The purpose of the email was not fundraising and there was no appeal for funds. It cited factual information only. No money was spent on this communication. The PS of the email cites an upcoming court date – more useful information for PRSM supporters.

Please let me know if you have further questions.

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