



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

September 9, 2019

Delivered electronically to "[shauna.f.walters1775@gmail.com](mailto:shauna.f.walters1775@gmail.com)"

Subject: PDC Case 55284

Dear Shauna Walters:

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

As noted below to Philip Johnson, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and 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 not accepting over-limit contributions, including in-kind contributions. You are further reminded to refund any over-limit contributions immediately. If checks from your campaign bank account are not available, you are encouraged to use a cashier's check, money order or other form of payment to facilitate a refund. PDC staff expects that you will take reasonable steps to prevent, and promptly refund, any over-limit contributions 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 at [pdcc@pdcc.wa.gov](mailto: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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September 9, 2019

Delivered electronically to "[pjforbg@yahoo.com](mailto:pjforbg@yahoo.com)"

Subject: Complaint regarding Shauna Walters, PDC Case 55284

Dear Philip Johnson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 22, 2019. Your complaint alleged that Shauna Walters may have violated RCW 42.17A.220, WAC 390-16-105 & .125 by exceeding \$300 in anonymous contributions, accepting a contribution greater than \$500, and failure to change reporting options from mini to full.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the response provided by Shauna Walters (the "Respondent"); and the applicable PDC reports filed by Respondent to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- The Respondent is a first-time candidate for Battle Ground City Council who registered as a candidate with the PDC on May 15, 2019 and selected the mini-reporting option. As a mini-reporter, the Respondent is not required to report deposits, contributions & expenditures to the PDC on a weekly or monthly basis.
- Pursuant to RCW 42.17A.220, candidates must forfeit accumulated unidentified (anonymous) contributions in excess of \$300 received in the current calendar year (or 1% of total accumulated contributions, whichever is greater) by 1) escheating the overage to the State of Washington's general fund; or 2) returning the contributions, if the donors' identity can be ascertained.
- The Respondent indicated she does not have any anonymous donors because her fundraising platform sends her the donor's information, which she tracks on a spreadsheet. The platform gives the appearance that donations are anonymous when in fact the Respondent can attribute the donation to the sender.
- As a mini-reporter and pursuant to WAC 390-16-105, the Respondent cannot raise or spend more than \$5,000 on an election campaign or accept more than \$500 from a single donor. Exceeding these limits nullifies a filer's mini-reporting status and triggers the requirement to regularly report deposits, contributions & expenditures to the PDC. WAC 390-16-125 sets forth the requirements for filers who wish to change their reporting option from mini to full.

- The Respondent's online fundraising platform at [https://fundrazr.com/WaltersforBGCouncil?ref=ab\\_4e0fcwoH4LI4e0fcwoH4LI](https://fundrazr.com/WaltersforBGCouncil?ref=ab_4e0fcwoH4LI4e0fcwoH4LI) does not have any controls to prevent it from accepting donations greater than \$500. Upon the advice of PDC staff, the Respondent resolves this issue by issuing refunds to people who donate more than \$500. The Respondent also made a good-faith effort to prevent supporters from making over-limit contributions by calling out the mini-reporting contribution limits in her introduction post on Fundrazr.com.
- The Respondent received a \$1,000 contribution from Jessica Nicholson on May 23, 2019 that was \$500 over the limit for mini-reporting. The Respondent refunded half of Ms. Nicholson's over-limit contribution by check on June 12, 2019, once she had received checks in the mail from her campaign's banking institution.
- In her response to the complaint, the Respondent also disclosed that she refunded \$123.31 of a \$623.31 over-limit in-kind contribution of yard signs from Phil Hogan. The over-limit contribution was made on May 20, 2019 and refunded on June 12, 2019.
- Records provided by the Respondent show she has raised a total of \$3,166 from all sources as of July 26, 2019. As of August 29, 2019, the Respondent raised \$2,825 via her online fundraising platform.
- Mitigating factors in this case include: The Respondent's status as a first-time candidate; the Respondent's good-faith efforts to comply with contribution limits by seeking out guidance from the PDC; the Respondent's corrective actions to refund over-limit contributions prior to any complaint being filed; and the relatively small or unsophisticated nature of the Respondent's campaign.

Based on these findings, staff has determined that, in this instance, the receipt of two over-limit contributions, which were refunded to the donors, does not amount to a violation warranting further investigation.

PDC staff is reminding Shauna Walters about the importance of not accepting over-limit contributions, including in-kind contributions. Ms. Walters is further reminded to refund any over-limit contributions immediately.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

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

Sincerely,

/s \_\_\_\_\_  
 Tabatha Blacksmith  
 Compliance Coordinator

Endorsed by,

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

cc: Shauna Walters