



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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October 29, 2019

Delivered electronically to Sandra Robson at sjrer2@icloud.com

Subject: Complaint regarding Whatcom County Affordable Housing Council, PDC Case 57738

Dear Ms. Robson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 18, 2019. Your complaint alleged that the Whatcom County Affordable Housing Council, may have violated RCW 42.17A.205(5) and WAC 390-16-011A for failure to include sponsor in the committee's name.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Whatcom County Affordable Housing Council (Committee); and reviewed their data in the PDC contribution database, to determine whether the record supports a finding of one or more violations.

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

- On April 12, 2019, the Committee filed a Committee Registration (C-1pc report) as a Continuing Other Political Committee, selecting the Full Reporting Option, and listing Robert Lee and William Henshaw as Campaign Manager and Treasurer, respectively. The Committee's name did not include the sponsor's name as required when a committee has a sponsor.
- RCW 42.17A.205 (5) states in part that, "the "name" of a sponsored committee must include the name of the person who is the sponsor of the committee. If more than one person meets the definition of sponsor, the name of the committee must include the name of at least one sponsor but may include the names of other sponsors." Likewise, WAC 390-16-001A (2) states, "A sponsored political committee shall include on its C-1pc the name of at least one sponsor in the committee's name."
- Staff review of the Monetary Contribution reports (C-3 reports) and the Summary Full Campaign Contribution and Expenditure reports (C-4 reports) found the committee received more than 80% of its contributions from the Building Industry Association of Whatcom County (BIAWC), making the BIAWC a sponsor.
- On October 2, 2019, the Committee amended its C-1pc and changed the Committee's name to "Whatcom County Affordable Housing Council sponsored by the Building Industry Association of Whatcom County."

Based on these findings, staff has determined that, in this instance, failure to include the sponsor name in the name of the committee is a violation that does not warrant further investigation. The Committee made a good faith effort by responding quickly and amending its Committee Registration to reflect BIAWC as the sponsor of the Committee.

However, staff is reminding the Whatcom County Affordable Housing Council about the importance of including the name of the sponsor in the committee's name in the future.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov

Sincerely,

Endorsed by,

s/ _____
Erick Agina, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director

cc: Whatcom County Affordable Housing Council

