



**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](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

November 20, 2019

Delivered electronically to Glen Morgan at [glen@wethegoverned.com](mailto:glen@wethegoverned.com)

Subject: Complaint regarding Woodinville Citizens First, PDC Case 59175

Dear Mr. Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 23, 2019. Your complaint alleged that the Woodinville Citizens First, may have violated RCW 42.17A.205, .210 and .215 by failing to timely and accurately file Committee Registration and RCW 42.17A.320 for failure to disclose complete sponsor identification on a political advertising.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; the applicable PDC reports filed by the Woodinville Citizens First (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:

- The Committee did not file a Committee Registration with the Commission as required by law, even though it made expenditure in the amount of \$2,203.70 to *Trade Printery* on October 17, 2019, for a mailer.
- 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."
- The Committee failed to file the Committee Registration even though it made \$2,203.70 in expenditure for a mailer. Staff also found that the Committee's name did not include the name of the sponsor. The Committee received more than 80% of its contributions from Ms. Boundy-Sanders, making her a sponsor.
- In its response, the Committee, by way of its sponsor, Susan Boundy-Sanders stated, "I originally tried to register on October 7. I was unable to log in despite confirmation that I was using the log in information on file with the PDC. My password recovery email time-stamped October 7, 2019, at 7:10pm is in direct confirmation of this attempt." Ms. Boundy-Sanders also stated, "On October 10, I had a support phone call with a gentleman at the PDC. He confirmed my login information and confirmed that the login was not

working. My understanding at the conclusion of this phone call was that he would pursue a solution with the other PDC staff and get back to me. My understanding was that no action was needed from me until I hear back from him.”

- The mailer depicting “Susan Boundy-Sanders” and “Paula Waters” as top contributors was an accurate depiction of the Committee’s top 5 contributors. Ms. Waters, according to Ms. Bound-Sanders, was listed as a top 5 contributor because she made a pledge to contribute towards the expenditure for the mailer, but had not contributed her portion by the time the mailer went out.
- In her response pertinent to the identification of the top 5 contributors to the Committee issue, Ms. Boundy-Sanders stated, “The sponsorship declaration does not attempt to conceal the primary sponsor as the complaint claims (I’m not entirely comfortable that a person I’ve never met is trying to tell you what my intentions were).”
- On November 1, 2019, the Committee filed its C-1pc and changed the Committee’s name to “Woodinville Citizens First sponsored by Susan Boundy-Sanders.” The Committee also amended its LMC and C-6 reports to reflect the new Committee’s name with the sponsor information.

Based on these findings, staff has determined that, in this instance, the Committee’s failure to file a Candidate Registration in a timely manner and include Ms. Boundy-Sanders as the only sponsor in the name of the Committee does not amount to a violation warranting further investigation. The Committee made a good faith effort by responding quickly and working with the PDC filer assistance staff to file the missing Candidate Registration, including amending its Last-Minute Contribution (LMC) and the Independent Expenditure (C-6) reports to reflect Susan Boundy-Sanders as the sole sponsor of the Committee. Ms. Boundy-Sanders also tried to register the Committee before this complaint was filed, but she experienced technical issues and actually reached out to the PDC staff regarding the technical issues.

However, staff is reminding the Committee about the importance of timely filing Committee Registration (C1pc) report and including proper and complete sponsor identification on political advertising when applicable in future years in accordance with the PDC laws and rules.

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](mailto:pdcc@pdc.wa.gov)

Sincerely,

Endorsed by,

s/\_\_\_\_\_  
Erick Agina, Compliance Officer

s/\_\_\_\_\_  
BG Sandahl, Deputy Director  
Peter Lavalley, Executive Director

cc: Woodinville Citizens First Sponsored by Susan Boundy-Sanders