



**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

December 16, 2019

Delivered electronically to "citizensforlibertyandlabor@gmail.com"

Subject: Complaint filed by Bruce Thomson, PDC Case 59671

Dear Citizens for Liberty and Labor:

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

As noted in the letter to Bruce Thomson, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



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December 16, 2019

Delivered electronically to “rapidfire10ring@hotmail.com”

Subject: Complaint regarding Citizens for Liberty and Labor, PDC Case 59671

Dear Bruce Thomson:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 1, 2019. The complaint alleged that Citizens for Liberty and Labor (Respondent), a political committee may have violated RCW 42.17A.405 and WAC 390-05-210 for making over-limit coordinated expenditures in support of Candidate Stuckart, RCW 42.17A.235 and .240 for failure to timely and accurately report coordinated expenditures in support of Candidate Stuckart on Summary Contribution and Expenditure reports (C-4 reports), and RCW 42.17A.255, .260, and .305 for certifying independent expenditures or electioneering communications as independent, when they may have been coordinated.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the response provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Pursuant to RCW 42.17A.255, 260, 305 the Respondent is required to timely and accurately report independent expenditures and electioneering communications in support or opposition of a candidate or ballot measure.
- The Respondent filed C-6 report on October 17, 2019, October 27, 2019, and October 30, 2019 reporting independent expenditures and electioneering communications totaling \$15,597.61 for mailers and postage in support of Candidate Stuckart.
- The complaint alleges that the Respondent and the candidate coordinated on the mailers which would make them in-kind contributions to the candidate in violation of the \$1,000 contribution limit per election set forth in RCW 42.17A.405.
- Pursuant to WAC 390-05-210 duplicating political advertising or making expenditures in, “cooperation, consultation, concert, or collaboration with, or at the request or suggestion of a candidate, the candidate’s authorized committee or agent” are contributions to the candidate, not independent expenditures.
- Pursuant to RCW 42.17A.235, .240 the Respondent is required to report all expenditures timely and accurately on C-4 reports.
- The Respondent did not appear to coordinate on the political advertising in support of Candidate Stuckart, as confirmed through the response to the allegations and Lawton’s Printing’s disclosure of commercial advertiser books of account.

Based on our findings staff has determined that, in this instance, no evidence supports a finding of a violation that warrants further investigation.

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 Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Citizens for Liberty and Labor