



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908  
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March 2, 2020

Delivered electronically to “marlpo01@noa.nintendo.com”

Subject: Staff-generated complaint, PDC Case 64859

Dear Nintendo of America:

On February 13, 2020, the Public Disclosure Commission (PDC) notified you of an alleged violation of RCW 42.17A.630 for failure to timely file the annual Lobbyist Employer’s Expense report (L-3 report) disclosing lobbying activities for calendar year 2018.

PDC staff have reviewed this matter and found the following:

Nintendo of America completed a Statement of Understanding (SOU) and paid a \$100 civil penalty in accordance with WAC 390-37-143 (Brief Enforcement Penalty Schedule), acknowledging violations of RCW 42.17A.630 for failure to timely file the annual L-3 report, due no later than February 28, 2019. The L-3 report was received on February 19, 2020, 356 days beyond the statutory deadline. The \$100 penalty assessed resolves the allegations listed in your complaint.

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)(a). The PDC 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 Fox Blackhorn at 1-360-753-1980, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

/s

\_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s

\_\_\_\_\_  
BG Sandahl  
Deputy Director, for  
Peter Lavallee  
Executive Director