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State of Washington

PUBLIC DISCLOSURE COMMISSION

**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)

**Public Disclosure Commission Statement of Understanding**

**Democratic Association of Secretary of States (DASS): PDC Case 78774**

Christopher Guerrero, as an Officer of the Democratic Association of Secretaries  
(Printed Name of Officer for Respondent) of State (DASS), hereby acknowledge that DASS:

Failed to timely file two Independent Expenditure reports (C-6 reports) disclosing independent expenditures undertaken in support of Gael Tarleton, a 2020 Democratic candidate seeking the office of Washington State Secretary of State, in violation of RCW 42.17A.260.

RCW 42.17A.260 requires sponsors of independent expenditure political advertisements undertaken within 21-days of an election who spend more than \$1,000 supporting or opposing a candidate(s) to file a C-6 report within 24 hours of presenting political advertising to the public.

- On October 25, 2020, DASS filed a C-6 report disclosing an \$83,650 expenditure was made to SKDKnickerbocker on October 8, 2020 for digital independent expenditure advertisements that were presented to the public on October 14, 2020, in support of Gael Tarleton. DASS was required to file a C-6 report within 24 hours of the advertisements being presented to the public or no later than October 15, 2020, and the C-6 report was filed 10 days late.
- On October 26, 2020, DASS filed a C-6 report disclosing three independent expenditures were made totaling \$118,500 in support of Gael Tarleton, that included: (1) a \$74,000 expenditure made to SKDNICKERBOCKER on October 19, 2020 for digital ads presented to the public on October 20, 2020; and (2) two expenditures totaling \$44,500 made to Sadler Strategic Media, Inc. for radio ads presented to the public on October 22, 2020.

- DASS was required to file a C-6 report within 24 hours of the independent expenditure advertisements being presented to the public or no later than October 21 and October 23, 2020 respectively. DASS filed the C-6 reports between three and five days late, based on the date the advertisements were presented to the public.

DASS would like to avoid the time and expense resulting from a Brief Adjudicative Proceeding (Brief Enforcement Hearing) being scheduled by Public Disclosure Commission (PDC) staff.

Therefore, in lieu of PDC staff scheduling a Brief Enforcement Hearing, DASS is completing this Statement of Understanding, and enclosing a check or money order in the amount of \$300 as a penalty payment to resolve this matter.

The \$300 penalty being assessed in this matter includes \$150 for each of the two acknowledged violations of RCW 42.17A.260 by the Democratic Association of Secretaries of State for failing to timely file C-6 reports during the 2020 election cycle, in accordance with the Penalty Schedule adopted by the Commission for Brief Enforcement Hearings set forth in WAC 390-37-143.

The Democratic Association of Secretaries of State understands that by completing this Statement of Understanding, DASS is acknowledging violations of Chapter 42.17A RCW and Title 390 WAC as set forth above and waiving its right to a hearing in this matter. DASS further understands that this will resolve the issue of failing to timely file the two C-6 reports.



Christopher Guerrero, Officer  
Democratic Association of Secretaries of State

1-5-21  
Date Signed

Please make your check or money order payable to the "Washington State Treasurer" and be sure to include the PDC Case number in the memorandum field, and mail or deliver this Statement of Understanding along with your payment to:

Public Disclosure Commission  
P.O. Box 40908  
Olympia, WA 98504-0908