



**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 • Website: www.pdc.wa.gov

January 2, 2020

Delivered electronically to “dwhite0221@gmail.com” and “kmann8005@yahoo.com”

Subject: Complaint filed by Mary Brown, PDC Case 34943

Dear Responsible Taxation of Citizens:

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

As noted in the letter to Mary Brown, 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

/s

Fox Blackhorn
Compliance Coordinator 2

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director



**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

January 2, 2020

Delivered electronically to “browngh@aol.com”

Subject: Complaint regarding Responsible Taxation of Citizens, PDC Case 34943

Dear Mary Brown:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on April 20, 2018. The complaint alleged that Responsible Taxation of Citizens (Respondent), a political committee, may have violated WAC 390-16-125 for exceeding the limitations of the Mini Reporting option without prior written authorization from the PDC; and RCW 42.17A.235 and .240 for failure to timely report contributions and expenditures.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; and the responses provided by the Respondent, to determine whether the record supports a finding of one or more violations.

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

- The Respondent first registered as a political committee in opposition to Peninsula School District 401’s bond request on February 2, 2018, selecting the Mini Reporting option provided by WAC 390-16-105, which exempted them from the requirement to file regular reports of contributions and expenditures in accordance with RCW 42.17A.235 and .240, provided they accepted no more than \$500 in contributions from any single source, and raised and spent no more than \$5,000 in the aggregate over the course of the election campaign.
- On or about April 16, 2018, residents received a mailer sponsored by the Pierce County Republican Party, which directed recipients to the website “www.responsibletaxation.org.”
- On April 19, 2018, you examined the books of account for the Respondent and found a \$400 contribution from Nancy Gibson for “Mailer Design” without a corresponding expense for printing and mailing.
- The Pierce County Republican Party reported independent expenditures for printing and mailing totaling \$2,579.65 on an Independent Expenditure and Electioneering Communication report (C-6 report) filed April 17, 2018.
- The complaint alleged that the Pierce County Republican Party duplicated the Respondent’s political advertising in cooperation, consultation, concert, collaboration, or at the suggestion of the Respondent or their agent as provided by WAC 390-05-210, making the value of the printing and mailing reportable as in-kind contributions to the Respondent in excess of the limitations of the Mini Reporting option.

- WAC 390-05-190 defines agents as persons with the consent or authority to act on behalf of a committee, whether that authority or consent is direct or indirect, express or implied, oral or written.
- The Respondent denies that they gave any such consent or authority to Nancy Gibson to take the mailer she designed to the Pierce County Republican Party, and they deny that they had personal knowledge of who provided the mailer or when.
- The complaint does not provide sufficient evidence to support the allegations of collaboration and coordination between the Respondent and the Pierce County Republican Party.

Based on our findings staff has determined that, in this instance, insufficient 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at fdc@fdc.wa.gov.

Sincerely,

/s

Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Responsible Taxation of Citizens