



**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)

October 27, 2021

Delivered electronically to [washougalmoms@protonmail.com](mailto:washougalmoms@protonmail.com)

Subject: PDC Case 99603, Complaints filed by Melanie Wilson and Wendi Moose

Dear Washougal Moms:

Below is a copy of an electronic letter sent to Melanie Wilson and Wendi Moose concerning complaints filed October 8 and October 17, 2021 with the Public Disclosure Commission (PDC).

In review of your website and response to the PDC, PDC staff found apparent violations of RCW 42.17A.205 for failing to register as a political committee and RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports.

Washougal Moms received an in-kind contribution for signs and also supports and opposes political candidates. In addition, the Washougal Moms website reflects that the organization (1) solicits and has accepted contributions for its activity and (2) engaged in the additional political activity of placing signs in the area. Taken together, these activities meet the requirements under Washington state law for Washougal Moms to register with the Public Disclosure Commission as a political committee and report its contributions and expenditures.

Staff advises you to consult information on the PDC website on [New Political Committees](#), [RCW 42.17A.205](#) and [PDC Interpretation 07-02](#). This information will guide you through the requirements to register as a political committee.

In addition, Washougal Moms must include the words "paid for by" or "sponsored by" followed by the name and address of the Committee on webpages advertising in support of or opposition to candidates or ballot measures. See [WAC 390-18-010](#).

Pursuant to WAC 390-37-060(1)(d), this letter serves as a formal written warning concerning your failure to timely report and identify the sponsor of political advertising as required.

Staff expects you will update the website and register with the PDC by October 31, 2021 and, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

As noted in the letter below, once Washougal Moms completes its filing obligation with the PDC and updates its website, the matter is dismissed in accordance with RCW 42.17A.755(1) and the PDC will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov)

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Peter Lavalley  
Executive Director



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October 27, 2021

Delivered electronically to [wdmoose@yahoo.com](mailto:wdmoose@yahoo.com) and [potomac818@gmail.com](mailto:potomac818@gmail.com)

Subject: Complaint regarding Washougal Moms, PDC Case 99603

Dear Melanie Wilson and Wendi Moose:

The Public Disclosure Commission (PDC) has completed its review of the complaints filed October 8 and October 17, 2021. The complaints alleged Washougal Moms violated RCW 42.17.205 by failing to register as a political committee, and RCW 42.17.320 by failing to include the proper sponsor identification on its website. Upon review, PDC staff added alleged violations of RCW 42.17A.235 and .240 for failure to timely and accurately report contributions and expenditures on Monetary Contributions (C-3) and Full Summary Contributions and Expenditures (C-4) reports.

PDC staff reviewed the allegations, evidence you provided, the Washougal Moms website, applicable statutes and rules and the response provided by Washougal Moms to determine whether the record supports a finding of one or more violations.

Based on PDC staff's review, it was found:

- Washougal Moms received an in-kind contribution for signs and supports and opposes political candidates.
- In its response, Washougal Moms stated: "A member in the community gifted those .. we have made no expenses at all as WashougalMoms."
- However, the website <https://washougal moms.com/> states "We have been posting our signs all over town. If you would like one to place on your property please email us. We ask that you put it in view of cameras because they have been getting stolen and they cost \$12 a piece (we got an amazing deal from a fan) Local shops print those at \$25 each."
- Monetary contributions are not the only things of value received by campaigns. Frequently, contributors will donate goods and services instead of or in addition to making monetary donations. Whenever the campaign receives an item or service that meets the definition of contribution and the campaign does not pay full value for the item or service, a reportable in-kind contribution has been received.
- The Washougal Moms website notes the organization: (1) solicits and has accepted contributions for its activity, (2) lists candidates to support and oppose, and (3) notes additional political activity of placing signs in the area.

- Taken together, these activities meet the legal requirements for Washougal Moms to register with the Public Disclosure as a political committee and report its contributions and expenditures.
- On webpages advertising support or opposition for candidates or ballot measures, Washougal Moms must include the words "paid for by" or "sponsored by" followed by the name and address of the Committee.

Washougal Moms will receive a formal written warning pursuant to WAC 390-37-060(1)(d) concerning the failure to timely register with the PDC, report contributions and expenditures and the lack of sponsor identification on its website.

The formal written warning includes staff's expectation Washougal Moms register with the PDC for the 2021 election by October 31, 2021 and, in the future, timely and accurately file PDC reports and disclose contributions and expenditures as required by law.

The Commission will consider the formal written warning in deciding on future Commission action if there are future violations of PDC laws or rules.

Once Washougal Moms completes its filing obligation with the PDC and updates its website, the matter is dismissed in accordance with RCW 42.17A.755(1) and the PDC will not conduct a more formal investigation into the allegations or take further enforcement action in this matter.

If you have questions, contact Alice Fiman toll-free at 1-877-601-2828 or by e-mail at [fdc@fdc.wa.gov](mailto:fdc@fdc.wa.gov).

Sincerely,

/s

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Alice Fiman  
Compliance Officer

/s

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Peter Lavalley  
Executive Director