



State of Washington
PUBLIC DISCLOSURE COMMISSION
711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
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Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdca.wa.gov

April 12, 2022

Sent electronically to Carolyn Crain and SW WA Federated Republican Women's Club

Subject: Complaint filed by Terri Niles, PDC Case 102709

Dear Ms. Crain,

Enclosed is a copy of an electronic letter sent to Terri Niles concerning a complaint filed on November 5, 2021.

As noted in the electronic letter, staff has determined that the activities undertaken by you in opposition to several of the 2021 Clark County Charter Amendments that included using your personal computer and printer to produce 200 fliers costing an estimated \$75, did not require you to file an Independent Expenditures report (C-6 report) of \$100 or more in accordance with RCW 42.17A.

The Southwest Washington Federated Republican Women's Club was not required to register and file reports as a political committee or ballot measure committee, since they did not make any expenditures to support or oppose any of the 2021 Clark County Charter Amendments, and they did not solicit or accept contributions to support or oppose the Charter Amendments.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have any questions, please contact PDC Compliance Officer Kurt Young by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Electronically Signed Kurt Young,
Compliance Officer

s/ _____
Electronically Signed Kim Bradford, Deputy Director for
Peter Lavalley, Executive Director





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April 12, 2022

Sent electronically to Terri Niles

Subject: Complaint regarding Carolyn Crain and the SW WA Federated Republican Women's Club,
PDC Case #102709

Dear Teri Niles:

The Public Disclosure Commission (PDC) has completed its investigation of the complaint you filed against Carolyn Crain and the Southwest WA Federated Republican Women's Club (SWFRWC) for PDC Case #102709.

Specifically, the complaint alleged that Ms. Crain and the SWFRWC violated: (1) RCW 42.17A.205, .235, and .240 by failing to register and file reports as a local ballot measure committee in opposition to the Clark County Charter Amendments that appeared on the November 2, 2021 general election; or (2) RCW 42.17A.255 by failing to file reports of Independent Expenditure (C-6 report) disclosing independent expenditures made in opposition to the Clark County Charter Amendments.

PDC staff reviewed your allegation listed in the complaint; the applicable statute(s), rule(s), the 2021 reporting requirements for a political committee and independent expenditures; and the responses to the complaint submitted by Carolyn Crain, first Vice-President with the SWFRWC. Based on staff's review, we found the following:

- For the 2021 election cycle, there were 10 Clark County Charter Amendments that appeared on the November 2, 2021, general election.
- Staff reviewed the November 2, 2021, Clark County general election results and found the voters approved eight of the ten Charter Amendments: 1, 2, 3, 4, 5, 7, 8 and 9.
- Carolyn Crain, as First Vice-President of the SWFRWC, stated based on her knowledge she did "not believe that there was any formal committee coordinated regarding this issue. There were hundreds of upset people over the failure of the County Council to properly perform their duties and to publish a voter's pamphlet without any opposition statements to the amendments."
- Ms. Crain stated that the SWFRWC is a small women's club with 12 members, and that they "do not donate to or endorse candidates. We do attempt to keep people informed on legislation and items that will be on their ballots. We have a website and a Facebook page and monthly meetings with speakers."

- Ms. Crain stated she designed a handout/flyer to use at the SWFRWC meeting using her own computer and Office 365 publisher. She stated that she printed the flyers from her computer at her home using her own “paper stock and ink. I am not sure what the ink and paper cost me at this time because I did not go out and buy it for this purpose. I did print 200 Flyers.”
- Ms. Crain stated the SWFRWC held its monthly October meeting in which the Clark County Charter amendments were the topic of the discussion, and that there were about 60 people in attendance. She stated she made the flyers available at the meeting and that some of the attendees took flyers with them. She estimated that she spent less than \$75 in total using her personal funds for the materials and the use of her computer, and she added that amount may have been a little high.
- Ms. Crain stated that Kris Greene was one of the people in attendance at the meeting. She stated that at the end of the SWFRWC meeting she gave the remaining fliers to Mr. Greene for him to distribute at his office. She stated Mr. Greene informed her that he distributed the fliers to a few people and some people took a few more from his office, but the bulk of them “landed in the trash after the election when I spoke to him.”
- As noted in the [February 2, 2022, PDC resolution letter](#) concerning the Kris Greene and Cemal Richards complaints, Mr. Greene stated the SWFRWC [sic] printed the “Vote No” fliers and made them available to him. He indicated that he did not “recall the exact number” of flyers that he took, but he made them available at his office. He estimated that he had about 50 fliers sitting on a table in the front lobby of his office “for folks to stop in and take them.” He stated that Mr. Richards also picked up some fliers, but he had no idea how many he took.
- Concerning the yard sign allegation, staff reviewed the yard signs which were two-sided, white corrugated plastic, and appeared to be slightly larger than the standard 14” x 22” yard signs and stated “VOTE NO Charter Amendments 1-9!! Save Your Voice!! Stop the Gerrymander of District Lines.” The yard signs did not have any other identifying information included such as a website or email address, no contact information or sponsor name, and no union bug or printer identification number. In accordance with WAC 390-18-030(2)(e) yard signs that are smaller than 8’ x 4’ dimensions are exempt from the sponsor identification requirements.
- Ms. Crain stated that the yard signs were left at her house on her front porch at the house while she was not at home, by an individual. She stated there “were only a couple of dozen yard signs at the most with a sticky note attached to them from Tom. I could not find out who that was.” She stated that after the signs had been left, she gave the yard signs to Mr. Greene since she had several things going on and she did have time to deal with them.
- Mr. Greene stated in his response that the SWFRWC made the yard signs available to him, and that he picked up the “Vote No” signs at the home of Carolyn Crain, First Vice-President of the SWFRWC. He stated that he had no idea who printed the signs.
- Neither Ms. Crain or the SWFRWC solicited or accepted any contributions to oppose the Clark Charter Amendments. Ms. Crain previously stated that she used her personal funds and resources to print the fliers.

Based on these findings, staff has determined in this instance that the activities undertaken by Carolyn Crain in opposition to several of the 2021 Clark County Charter Amendments, that included her using her personal computer and printer to produce 200 fliers costing an estimated \$75, did not require her to file an Independent Expenditures report (C-6 report) of \$100 or more in accordance with RCW 42.17A.

PDC staff found no evidence that Ms. Crain solicited or accepted contributions to support or oppose any of the 2021 Clark County Charter Amendments, and was not required to register and file reports as a political or ballot measure committee.

In addition, staff found no evidence that the Southwest Washington Federated Republican Women's Club made any expenditures to oppose any of the 2021 Clark County Charter Amendments, and they did not solicit or accept any contributions to support or oppose the 2021 Clark County Charter Amendments. Thus, the Southwest Washington Federated Republican Women's Club was not required to register and file reports as a political committee or ballot measure committee.

Unfortunately, based on the lack of information as noted above concerning the "Vote No" yard signs, PDC staff was not able to ascertain the person responsible for paying for and sponsoring the yard signs, or the printer responsible for producing the yard signs, despite investigative efforts.

Based on this information, the PDC has dismissed the allegations against Carolyn Crain and Southwest Washington Federated Republican Women's Club, in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Kurt Young, Compliance Officer by e-mail at pdcc@pdc.wa.gov.

Sincerely,

Endorsed by:

s/_____
Electronically Signed Kurt Young,
Compliance Officer

s/_____
Electronically Signed Kim Bradford, Deputy Director for
Peter Lavalley, Executive Director

cc: Carolyn Crain and Southwest Washington Federated Republican Women's Club

