



**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)**

February 3, 2023

Delivered electronically to [mtaylor@graysharbor.us](mailto:mtaylor@graysharbor.us)

Subject: Complaint filed by Michael Catlett, PDC Case 120588

Dear Michelle Taylor:

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

As noted in the letter to Michael Catlett, 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.

PDC staff is reminding you about the importance of not using public office/agency resources (facilities) to assist a campaign for election. Grays Harbor Deputy Sheriff's Association (GHDSA) officers are urged to be careful when communicating union business regarding candidate endorsements and campaign contributions using county email. While the use of county email by union representatives is permitted under certain conditions in accordance with a collective bargaining agreement, caution is recommended to ensure compliance with RCW 42.17A.555. PDC staff expects that, in the future, messages regarding union, guild or association business sent via the county email system that references a candidate or ballot proposition will be distributed in a manner that does not support or oppose any candidate or ballot proposition.

As stated in the PDC's [Guidelines for Local Government Agencies in Election Campaigns](#), public office/agency employees should not use agency email systems to communicate campaign-related information, including endorsements, generate or forward information that supports or opposes a candidate, or engage in political or campaign activities that involve the use of public resources. This resource also includes specific guidance for union representatives.

If you have questions, you may contact Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov)

Sincerely,

*Electronically signed Tabatha Blacksmith*  
Tabatha Blacksmith  
Compliance Officer

Endorsed by,

*Electronically signed Kim Bradford*  
Kim Bradford  
Deputy Director

For Peter Frey Lavallee  
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: [pdc@pdc.wa.gov](mailto:pdc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

February 3, 2023

Delivered electronically to [catlettforsheriff@gmail.com](mailto:catlettforsheriff@gmail.com)

Subject: Complaint regarding Michelle Taylor, PDC Case 120588

Dear Michael Catlett:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on November 7, 2022. The complaint alleged that three Grays Harbor County employees may have violated RCW 42.17A.555 by using public office/agency facilities to assist a campaign for election. Specifically, you alleged that these employees, including Michelle Taylor, used official work email to express support or endorsement for candidate Darrin Wallace.

PDC staff reviewed the allegations and evidence you submitted; the applicable statutes, rules, and reporting requirements; the response provided on behalf of the Respondent; and other relevant information to determine whether the record supports a finding of one or more violations.

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

- Michelle Taylor (the "Respondent") is a Grays Harbor County employee and served as Treasurer of the Grays Harbor Deputy Sheriffs Association in 2022.
- Grays Harbor Deputy Sheriff's Association ("GHDSA" or the "Association") appears to be the functional equivalent of a collective bargaining unit for Grays Harbor County employees.
- Darrin Wallace currently serves as County Sheriff of Grays Harbor County and was a candidate for this position during election year 2022. Candidate Wallace filed a *Candidate Registration* (C-1 report) with the PDC on May 13, 2022 and filed a *Declaration of Candidacy* with Elections officials on May 16, 2022. Prior to serving as County Sheriff, Darrin Wallace held the position of Chief Civil/Investigations Deputy of Grays Harbor County Sheriff's Department.
- On May 31, 2022, the Respondent sent a message to Ed McGowan using county email that was addressed to "Association Members." The email informed GHDSA's members they would be receiving two ballots with their payroll: One ballot each to vote on whether the Association should 1) support candidate Darrin Wallace; and 2) donate \$1,000 to his campaign.

- [RCW 42.17A.555](#) prohibits elected or appointed officials and public office or agency employees from using, or authorizing the use of, public office or agency facilities<sup>1</sup> for the purpose of assisting a campaign for election and promoting or opposing ballot propositions.
- Per [WAC 390-05-271\(1\)](#), individuals are not restricted under .555 from expressing their own personal views concerning supporting or opposing any candidate or ballot proposition, if such expression does not involve the facilities of a public office or agency.
- Pursuant to .555(3), the prohibition on use of public office/agency facilities does not apply to activities that are “part of the normal and regular conduct of the office or agency” which is defined in [WAC 390-05-273](#) and includes activity that is lawful and usual (not extraordinary).
- On November 30, 2022, Darrin Wallace provided a response to the complaint allegations on behalf of Grays Harbor County Sheriff’s Office employees, including Michelle Taylor. In the response, Mr. Wallace stated that Michelle Taylor has been GHDSA’s Treasurer since 2017 and has used county email to communicate with the Association’s members in this role. Darrin Wallace said that the Respondent’s email was 1) sent to GHDSA members; 2) intended for internal use only; 3) informational in nature; and 4) not designed for political influence. He indicated that, at no time, did the Respondent ask or solicit Association members to support candidate Wallace or his campaign.
- The Respondent does not have previous warnings/violations of PDC requirements.

Given the GHDSA’s longstanding practice of using county email to communicate with its members, this activity appears to be normal & regular conduct for GHDSA officers. However, public office/agency employees should be very careful not use agency email systems to communicate campaign-related information, including endorsements, generate or forward information that supports or opposes a candidate, or engage in political or campaign activities that involve the use of public resources.

The PDC urges public office/agency employees to exercise caution when engaging in any activity that might be prohibited under .555. The PDC has developed [Guidelines](#) to aid local governmental agencies in complying with .555, including specific guidance for union representatives. However, hard and fast rules that are applicable in all situations are difficult to establish. For this reason, the unique facts and circumstances of each situation must be evaluated to determine if a violation has occurred.

Based on our findings, staff has determined that, in this instance, the use of official work email for the purpose of communicating with GHDSA members regarding union matters does not amount to a violation that warrants further investigation.

However, PDC staff is reminding Michelle Taylor about the importance of not using public office/agency resources (facilities) to assist a campaign for election. PDC staff urges GHDSA officers to be careful when communicating union business regarding candidate endorsements and

---

<sup>1</sup> “Facilities” of a public office or agency include, but are not limited to, use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of persons served by the office or agency.”

campaign contributions using county email. While the use of county email by union representatives is permitted under certain conditions in accordance with a collective bargaining agreement, caution is recommended to ensure compliance with RCW 42.17A.555. PDC staff expects that, in the future, messages regarding union, guild or association business sent via the county email system that references a candidate or ballot proposition will be distributed in a manner that does not support or oppose any candidate or ballot proposition.

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 Tabatha Blacksmith at 1-360-586-8929, toll-free at 1-877-601-2828 or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov)

Sincerely,

*Electronically signed Tabatha Blacksmith*

Tabatha Blacksmith  
Compliance Officer

Endorsed by,

*Electronically signed Kim Bradford*

Kim Bradford  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

cc: Michelle Taylor