



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.pdca.wa.gov

October 14, 2020

Sent electronically to tmccarthy253@gmail.com

Subject: Complaint filed by Ken Miller, PDC Case 27083

Dear Tom McCarthy:

Enclosed is a copy of an electronic letter sent to Ken Miller concerning a complaint filed October 27, 2017. The complaint alleges Integrity Matters may have violated RCW 42.17A.260 by failing to timely file a C-6 Independent Spending & Electioneering Communications report for expenditures on political advertising within 24 hours of presentation to the public, RCW 42.17A.320 by failing to include full names of Top 5 contributors on political advertising and RCW 42.17A.205 by failing to accurately register purpose of political committee.

As noted in the letter to Miller, 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 fully disclosing contributors and expenditure details and timely filing independent expenditures and/or electioneering communications. PDC staff expects in the future that you will identify sponsors and provide expenditure detail in accordance with PDC laws and rules.

If you have questions, you may contact Alice Fiman toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov

Sincerely,

/s

Alice Fiman
Compliance Officer

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director

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October 14, 2020

Sent electronically to Ken Miller at krm403@gmail.com

Subject: Integrity Matters, PDC Case 27083

Dear Ken Miller:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed October 27, 2017 regarding Integrity Matters.

Your complaint alleged Integrity Matters may have violated RCW 42.17A.260 by failing to timely file a C-6 Independent Spending & Electioneering Communications report for expenditures on political advertising within 24 hours of presentation to the public, RCW 42.17A.320 by failing to include full names of Top 5 contributors on political advertising and RCW 42.17A.205 by failing to accurately register purpose of political committee.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the mailer provided in the complaint and the PDC reports filed by Integrity Matters to determine whether the record supports a finding of one or more violations.

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

- Integrity Matters was a 2017 single-year committee supporting Jim Merritt for Mayor of Tacoma.
- On November 30, 2017, the Committee filed a Summary Receipts and Expenditure (C-4) report listing a \$6,733.52 expenditure made November 7, 2017 for printing.
- In the complaint, you provided the flyer the Committee mailed out, matching this expenditure, which meets the definition of political advertising.
- As noted in the complaint, the political advertising expenditure required the committee to file a C-6 Independent Spending & Electioneering Communications report within 24 hours of presentation to the public.
- The mailer also required full names to identify of its Top 5 contributors, not first initials, as the Committee listed its contributors on the provided flyer.
- On October 9, 2020, the Committee filed a (C-6) report with the PDC, reporting a \$8,894.44 expenditure to support James Merritt/oppose Victoria Woodards.
- The C-6 report listed the \$6,733.52 for printing, plus \$1,403.92 for postage and \$584 for data.

Based on these findings, and the fact the Committee dissolved in 2018 and Merritt was not elected Mayor of Tacoma, staff has determined in this instance, the does not amount to an actual violation warranting further investigation.

PDC staff is reminding Integrity Matters about the importance accurately listing its Top 5

contributors and accurately and timely filing all future PDC reports in accordance with the statutes and rules.

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 Alice Fiman toll-free at 1-877-601-2828, or by e-mail fdc@fdc.wa.gov.

Sincerely,

/s

Alice Fiman
Compliance Officer

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director