



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

May 15, 2019

Sent electronically to Mitch Short

Subject: Complaint filed regarding The ROC Foundation, PDC Case 26423

Dear Mr. Short:

Below is a copy of an electronic letter sent to Terry Sayles concerning the complaint he filed with the Public Disclosure Commission (PDC) against The ROC Foundation and you.

As noted in the letter to Mr. Sayles, the PDC will not be conducting a more formal investigation into these allegations or taking any action in this matter. Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
BG Sandahl, Deputy Director
For Peter Lavalley, Executive Director





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May 15, 2019

Sent electronically to Terry Sayles

Subject: Complaint filed against The ROC Foundation; PDC Case 26423

Mr. Sayles:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on October 2, 2017 against The ROC Foundation, a political consulting firm run by Mitch Short, spouse of State Senator Short, from the 7th Legislative District.

The complaint alleged that The ROC Foundation may have violated: (1) RCW 42.17A.205 by failing to timely register as a political committee; and (2) RCW 42.17A.235 and .240 by failing to timely file Monetary Contributions reports (C-3 reports), and Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing contribution and expenditure activities.

PDC staff reviewed the allegations listed in the complaint you filed, the statutes, rules and reporting requirements for a political committee, queried the PDC contribution and expenditure database for payments made to the ROC Foundation, and the responses to the complaint provided by Mitch Short. Based on staff's review, we found the following:

- RCW 42.17A.005(41) "Political committee" means any person (except a candidate or an individual dealing with his or her own funds or property) having the expectation of receiving contributions or making expenditures in support of, or opposition to, any candidate or any ballot proposition.
- Specifically, you alleged Mr. Short "started a political foundation some years back whose purpose was for Eastern Washington campaign contributors to have a way to support Republican candidates in Western Washington" and that the ROC Foundation has collected thousand dollars, but you were only able to find one \$1,500 contribution from the foundation.
- You stated that in 2017, the Shelly Short for Senate Campaign "gave the foundation a \$10,000 contribution as well as Shelly's ex-aide and current State Representative Jacquelin Maycumber gave the foundation \$10,000 as well." You added that you had searched the PDC and could not find that the ROC Foundation was registered as a political committee.
- The ROC Foundation is a political consulting firm run by Mitch Short, spouse of State Senator Shelly Short, from the 7th Legislative District, that has provided consulting and campaign services to Legislative candidates and several political party organizations dating back to 2011.

- For the 2018 election cycle, a query of the PDC contribution and expenditure database disclosed that the ROC Foundation received a total of \$83,700 in payments for political consulting services, and for a number of campaign related services including fundraising, polling, campaign managements, get-out-the-vote programs, and research. The services were provided to the following four incumbent candidates Shelly Short, Jaquelin Maycumber, Joel Kretz, and Mary Dye.
- Mr. Short stated that *“The ROC Foundation is the name of my consulting company. I consult with political candidates and help them with their campaigns.”* He stated that The ROC Foundation is not registered with the Washington State’s Secretary of State Office since it is not a corporation, and instead is *“a sole proprietorship, Doing Business As “The ROC Foundation.”* He stated that he has a business license with the State of and his current registration is *“Active”*.
- Mr. Short reiterated that The ROC Foundation is a sole proprietor DBA and that he consults *“with political candidates and they hire me to do work for them.”* The complaint and attached spreadsheet included payments made by the various campaigns to The ROC Foundation, and he stated the expenditure description listed on the Campaign Summary Full Contribution and Expenditure reports (C-4 reports) filed by each of the candidates disclosed *“the payments were made for campaign work I provided to the campaign or political committee. These payments were not “contributions” to a political organization. They were payments for services that I rendered to the various campaigns. Therefore, I am not required to file C-3 nor C-4 forms with the PDC.”*

Based on these findings, no evidence was provided or found indicating that The ROC Foundation met the definition of a political committee, either as a receiver of contributions, or making expenditures to support candidates or political committees. The ROC Foundation is a political consulting firm that was not required to register with the PDC as a political committee, and as noted above does not warrant further investigation.

Based on this information, the PDC has dismissed the complaint in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 664-8854, toll-free at 1-877-601-2828, or by e-mail at kurt.young@pdc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Kurt Young, Compliance Officer

s/ _____
BG Sandahl, Deputy Director for
Peter Lavalley, Executive Director

cc: Mitch Short, The ROC Foundation