



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

April 17, 2019

Delivered electronically to Mark Lamb at "mark@northcreeklaw.com"

Subject: Jinyoung Englund Complaint Return Cover Letter, PDC Case 25425

Mr. Lamb:

Below is a copy of an electronic letter sent to Kurt Fritts concerning the complaint he filed with the Public Disclosure Commission (PDC) against your client Jinyoung Englund. As noted below in the electronic letter to Mr. Fritts, the PDC will not be conducting a more formal investigation into these allegations or taking enforcement action in this matter.

Pursuant to WAC 390-37-060(1)(b), PDC staff is hereby formally warning Jinyoung Englund concerning the importance of including her party preference on all political advertisements sponsored by her Campaign in accordance with statute and rules, including the font size requirements, should she declare her candidacy for a partisan public office in the future.

This formal written warning conveys staff's expectation that Ms. Englund will fully comply with the political advertising requirements in the future should she file as a candidate. The Commission will consider this formal written warning if there are any future PDC law or rule violations by the Committee.

Based on this information, PDC staff is dismissing the remaining allegations listed in the complaint in accordance with RCW 42.17A.755(1). If you have questions, please contact PDC staff member Kurt Young by e-mail at kurt.young@pdcc.wa.gov.

Sincerely,

Endorsed by,

s/_____
Kurt Young, PDC Compliance Officer

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



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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 • Website: www.pdc.wa.gov

April 17, 2019

Delivered electronically to Kurt Fritts

Subject: Complaint filed against Jinyoung Englund, PDC Case 25425

Dear Mr. Fritts:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 27, 2017, against Jinyoung Englund, a candidate for State Senator in the 45th Legislative District in 2017. Your complaint alleged that the Jinyoung Englund Campaign (Campaign) may have violated RCW 42.17A.320 and WAC 390-18-020 by failing to include Ms. Englund's party preference on several political advertisements sponsored by her 2017 Campaign.

PDC staff reviewed the complaint and the attached political advertisements as exhibits, the political advertising statutes and rules, and response submitted by Mark Lamb, an attorney with the North Creek Law Firm representing Ms. Englund. As a result of our review, staff found the following:

- On April 11, 2017, Jinyoung Englund filed a C-1 report declaring her candidacy for State Senator in the 45th in 2017 and selecting the Full Reporting Option. Ms. Englund was a first-time candidate for public office.
- There were three prior complaints filed against Jinyoung Englund, PDC Cases 18732 and 18738 filed by Alex Bond, and PDC Case 21391 filed by Shawn Roland.
- One of the complaints filed by Mr. Bond alleged violations of RCW 42.17A.320 by failing to include the proper sponsor identification on political advertising sponsored by her Campaign. Mr. Lamb stated the complaint alleged the Campaign distributed political advertising in violation of WAC 390-18-010, the materials were "clearly designed for (and distributed to) Precinct Committee Officers in the 45th Legislative District" as an internal political communication."
- Staff concurred the political advertisement in question constituted an internal political communication of a political party organization and was exempt from the sponsor identification requirements.
- The complaint filed by Mr. Roland alleged violations of RCW 42.17A.320 by failing to include Ms. Englund's party preference on political advertising sponsored by her Campaign.

- In the Roland complaint, the Campaign had included the letters “GOP” at the end of the political advertisement or communication which is an acronym recognized by the PDC rules and guidance.
- The political advertisements submitted as part of your complaint included photographs of Campaign yardsigns and logo’s, that included the words “Englund for State Senate” with a very small (R) appearing to the top right of the “d” in Englund. While the party preference was included in the political advertisement, it appeared to be smaller than 10 percent of the largest font size appearing in the advertisement.
- In addition, you also provided a copy of a Campaign advertisement inviting recipients to attend the City of Kirkland’s 4th of July parade, that included the sponsor identification on the last page of the communication, followed by the letters “(GOP)”.

PDC staff found no evidence of a material violation that would require conducting a more formal investigation into your complaints or pursuing enforcement action in this instance.

Pursuant to WAC 390-37-060(1)(b), PDC staff has issued a formal written warning to Jinyoung Englund concerning the importance of including her party preference on all political advertisements sponsored by her Campaign as required by statute and rules, including the proper font size requirements, should she declare her candidacy for a partisan public office in the future. This formal written warning conveys staff’s expectation that Ms. Englund will fully comply with the political advertising requirements in the future should she **file** as a candidate. The Commission will consider this formal written warning if there are any future PDC law or rule violations by the Committee.

Based on this information, PDC staff is dismissing 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@pdc.wa.gov.

Sincerely,

Endorsed by,

s/ _____
Kurt Young, PDC Compliance Officer

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

cc: Mark Lamb, legal counsel for Jinyoung Englund Campaign

