



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

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January 3, 2020

Sent electronically to Lori Shavlik at [loritanning@gmail.com](mailto:loritanning@gmail.com)

Subject: Complaint regarding Brian Sullivan, PDC Case 23500

Dear Ms. Shavlik:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on August 2, 2017. Your complaint alleged that Brian Sullivan (Respondent), an incumbent County Councilmember for Snohomish County in 2017, may have violated RCW 42.17A.550, .555, .565 for unauthorized solicitation and use of public facilities, funds and resources.

PDC staff reviewed your complaint; the applicable statutes, rules, and reporting requirements; and the response provided on behalf of the Respondent by the Snohomish County Deputy Prosecuting Attorney Lyndsey M. Downs, to determine whether the records reviewed support a finding of one or more violations.

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

- The Complaint alleged that the Respondent used county resources and his position as a Snohomish County Councilmember to support, lobby and solicit money for Dawson Place Child Advocacy Center, a 501(c)(3) non-profit organization serving child victims of sexual or physical abuse in Snohomish County, in violation of RCW 42.17A.550, .555, .565.
- On January 21, 2014, the Respondent wrote a letter to the Washington State Representative Hans Dunshee. In the letter, the Respondent requested state funding to complete necessary renovations at the Dawson Place Child Advocacy Center.
- RCW 42.17A.550 prohibits the use of public funds to finance any political campaigns for a state or school district office.
- RCW 42.17A.555 prohibits elected officials from using or authorizing the use of any "facilities or a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition."

- RCW 43.17A.565 prohibits “state or local official or state or local official’s agent from knowingly soliciting, directly or indirectly, a contribution to a candidate for public office, political party, or political committee from an employee in the state or local official’s agency.”
- The Respondent was elected as a County Councilmember (District 2) for Snohomish County in November 2007 and has been a Snohomish County Councilmember since 2008. District 2 encompasses the cities of Everett and Mukilteo. The Child Advocacy Center of Snohomish County is located in the City of Everett, one of the cities represented by the Respondent. The Respondent’s contact with Representative Dunshee through official channels in his official capacity as County Councilmember to request appropriations for a program located in his district is not a violation of RCW 42.17A.550, .555, .565. Dawson Place is a 501(c)(3) non-profit and therefore not considered a ballot proposition or a political campaign. RCW 42.17A.550, .555 and .565 do not apply.

Based on these findings staff has determined that, in this instance, no evidence supports a finding of a violation warranting further investigation.

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 Erick Agina at 360-586-2869, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov)

Sincerely,

Endorsed by,

s/ \_\_\_\_\_  
Erick Agina, Compliance Officer

s/ \_\_\_\_\_  
BG Sandahl, Deputy Director  
For Peter Lavalley, Executive Director

cc: Lyndsey Downs, Deputy Prosecuting Attorney

