



**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@pdc.wa.gov](mailto:pdcc@pdc.wa.gov) • Website: [www.pdc.wa.gov](http://www.pdc.wa.gov)**

April 16, 2019

Delivered electronically to "Sheleysecrest@gmail.com"

Subject: Complaint filed by Andrew Saturn, PDC Case 23471

Dear Sheley Secrest:

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

As noted in the letter to Andrew Saturn, 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 the complete and accurate disclosure of all expenditure details, including the intrinsic value of networking data provided by consultants. PDC staff expects in the future that you will provide detailed break downs of expenditures in accordance with PDC laws and rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by email at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavallee  
Executive Director



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April 16, 2019

Delivered electronically to "saturn@gmail.com"

Subject: Complaint regarding Sheley Secrest, PDC Case 23471

Dear Andrew Saturn:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 12, 2017. The complaint alleged that Sheley Secrest, a 2017 candidate for Seattle City Council may have violated RCW 42.17A.240 for failure to accurately and completely disclose the value of a mailing list in expenditure details for B&B Consulting.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by Sheley Secrest; the applicable PDC reports filed by Respondent; and queried the Respondent's data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

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

- Sheley Secrest registered as a candidate for the 2017 election for Seattle City Council on January 11, 2017, and failed to file a Summary Full Campaign Contribution and Expenditure report (C-4 report) on the day of registration, disclosing contributions and expenditures prior to registration, as required by the version of RCW 42.17A.235 in effect at the time.
- The Secrest campaign filed its first C-4 report on February 10, 2017, disclosing a \$1,500 debt to B&B Strategies for "General consulting, web design, logo design" which should have been broken down and itemized in greater detail in accordance with RCW 42.17A.240 and WAC 390-16-037.
- Included in the \$1,500 cost for retaining the services of B&B Strategies was the value of a mailing list created by Mario Brown from a Facebook group called Washington for Bernie Sanders, that was titled "Sanders Delegates" in the mailserv program Mailchimp.
- The value of the mailing list should have been disclosed as a separate debt and disclosed as a separate expenditure, rather than being lumped under a generic consulting expenditure.
- Sheley Secrest lost in the primary election and has no prior found violations of PDC laws or rules.

Based on our findings staff has determined that, in this instance, failure to break out and itemize the value of a mailing list created by the campaign's consultant does not amount to an actual violation warranting further investigation.

PDC staff is reminding Sheley Secrest about the importance of the complete and accurate disclosure of all expenditure details, including the intrinsic value of networking data provided by consultants. In the future, PDC staff expects that Sheley Secrest will provide detailed breakdowns of expenditures in accordance with PDC laws 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Fox Blackhorn  
Compliance Coordinator 2

Endorsed by,

/s \_\_\_\_\_  
Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Sheley Secrest