



**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 23, 2019

Delivered electronically to "dan@danbradylaw.com"

Subject: Complaint filed by Jason Antonelli, PDC Case Nos. 22560 & 23086

Dear Master Builders Association of King & Snohomish Counties:

Below is a copy of an electronic letter sent to Jason Antonelli concerning complaints filed with the Public Disclosure Commission (PDC).

As noted in the letter to Jason Antonelli, 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 timely disclosure of all contribution and expenditure activities, especially independent expenditures/electioneering communications undertaken within 60 days of an election. PDC staff expects timely filings of all future PDC reports in accordance with the statutes 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@pdcc.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 23, 2019

Delivered electronically to “jason@jasonforredmond.com”

Subject: Complaint regarding Master Builders Association of King & Snohomish Counties (1) & (2), PDC Case Nos. 22560 & 23086

Dear Jason Antonelli:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on July 21, 2017. The complaint alleged that the Master Builders Association of King & Snohomish Counties (the Association), a continuing political committee, may have violated RCW 42.17A.235 for failure to timely file Monetary Contribution reports (C-3 reports) and Summary Full Campaign Contribution and Expenditure reports (C-4 reports), disclosing contributions and expenditures undertaken by the Campaign; and RCW 42.17A.255, .260, and .305 for failure to timely file Independent Spending & Electioneering Communications reports (C-6 reports), disclosing independent expenditures and electioneering communications presented to the public within 60 days of the 2017 primary election.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by the Association; 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:

- The Association failed to timely file the 21-day pre-primary C-4 report, due no later than July 11, 2017, as required by RCW 42.17A.235.
- The Association late filed the 21-day pre-primary C-4 report on July 21, 2017, disclosing \$81,544.61 in contributions, for 15.3% of contributions in that election year, and \$129,272.34 in expenditures, for 28.8% of expenditures in that election year, nine days beyond the statutory deadline of RCW 42.17A.235.
- On June 28, 2017, the Association sponsored an independent expenditure for polling in support of city council and mayoral candidates in Kent, Issaquah, and Sammamish, and failed to timely file a C-6 report disclosing this activity within five days of making the expenditure, or not later than July 3, 2017, as required by RCW 42.17A.255.
- The Association late filed the C-6 report for this activity on July 28, 2017, disclosing \$5,000 in independent expenditures, or 2.4% of total independent expenditure/electioneering communication activity in that election year.

- On July 19, 2017, the Association sponsored electioneering communications for mailed political advertising within 60 days of the 2017 primary election, and failed to timely file a C-6 report disclosing this activity within one business day of presentation to the public, or not later than July 20, 2017.
- The Association late filed the C-6 report for this activity on July 28, 2017, disclosing \$71,257.89, for a cumulative \$76,257.89 or 37.3% of total independent expenditure/electioneering communication activity in that election year.
- The Association is a large, sophisticated, and well financed and staffed committee, reporting to the PDC since at least 2005.
- These late reports were filed after their statutory deadlines, but before the 2017 primary election, and the Association has no prior found violations of PDC laws or rules.

Based on our findings staff has determined that, in this instance, failure to timely file one C-4 report and two C-6 reports does not amount to an actual violation warranting further investigation.

PDC staff is reminding Master Builders Association of King & Snohomish Counties about the importance of the timely disclosure of all contribution and expenditure activities, especially independent expenditures/electioneering communications undertaken within 60 days of an election. PDC staff expects timely filings of 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 Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Master Builders Association of King & Snohomish Counties