



**State of Washington  
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908

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Toll Free 1-877-601-2828 • E-mail: [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov) • Website: [www.pdcc.wa.gov](http://www.pdcc.wa.gov)

12/7/2018

Delivered electronically to "sos.committee.wa@gmail.com"

Subject: PDC Case 40733

Dear Phil Watson:

Attached is a copy of an electronic letter sent to Kaylee Pigott concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted to Kaylee Pigott, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

/s \_\_\_\_\_  
Micaiah Ragins  
Compliance Coordinator

Endorsed by,

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



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12/7/2018

Delivered electronically to “[kaylee.pigott@yahoo.com](mailto:kaylee.pigott@yahoo.com)”

Subject: Complaint regarding Save Our Security, PDC Case 40733

Dear Kaylee Pigott:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 11, 2018. Your complaint alleged that the Save Our Security campaign may have violated RCW 42.17A.320 for failure to list the top five contributors on their campaign website.

PDC staff reviewed your allegations, the statutes and rules, and the responses from Save Our Security. As a result of staff's review, we found the following:

- On June 10, 2018, Save Our Security filed a Political Committee Registration (C1pc) as a ballot committee in opposition to Initiative 1639.
- The Campaign filed two Summary Full Report Contributions and Expenditures (C-4 reports) regarding the following website expenditures: Report# 100843350 filed on July 10, 2018 disclosing \$99 for website applications and \$91.26 for website services; and Report# 100851132 filed on August 6, 2018 disclosing \$200 for website services. The total expenditures disclosed for the campaign website is \$390.26.

- Phil Watson, the Committee Treasurer for the Save Our Security campaign, provided a response on September 17, 2018. The response stated that the website did not meet the \$1,000 threshold that requires the disclosure of top five contributors.
- WAC 390-18-010(4)(a) states the following: Political committees that sponsor political advertising costing one thousand dollars or more supporting or opposing a ballot measure must clearly state the "top five contributors" to that committee pursuant to WAC 390-18-025.

Based on these findings and the following facts, staff has determined that in this instance, the failure to disclose the top five contributors on the campaign website does not amount to a material violation warranting further investigation since: (1) Save Our Security was not required to list the top five contributors because the Campaign did not make website expenditures costing \$1,000 or more.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Micaiah Ragins at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdc.wa.gov](mailto:pdcc@pdc.wa.gov).

Sincerely,

/s\_\_\_\_\_

Micaiah Ragins  
Compliance Coordinator

Endorsed by,

/s\_\_\_\_\_

Barbara Sandahl  
Deputy Director  
For Peter Lavalley  
Executive Director

cc: Save Our Security