



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.pdcc.wa.gov

December 26, 2018

Sent electronically to Daniel Davies, Owner of Mary's Pistols at
"maryspistols@gmail.com"

Subject: PDC Case No. 42268

Dear Daniel Davies:

Below is a copy of an electronic letter sent to Megan Atkinson and Michael Maddux (Complainants) concerning complaints filed with the Public Disclosure Commission (PDC). As noted below in the electronic letter to the Complainants, the PDC will not be conducting a more formal investigation into the allegations listed in the complaints against Mary's Pistols.

You confirmed in an email sent to PDC staff that on December 14, 2018, you completed and mailed a Statement of Understanding (SOU) along with the \$150 penalty payment and \$636.51 in anonymous contributions for deposit in the state general fund, on behalf of Mary's Pistols to the Department of Enterprise Services. In addition, you provided PDC staff with a signed copy of the SOU from the Committee acknowledging violations of RCW 42.17A.205, .220, and .255, that was dated October 18, 2108.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 360-753-1980, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Fox Blackhorn
Compliance Coordinator

s/ _____
Peter Lavalley
Executive Director



Public Disclosure Commission
Shining Light on Washington Politics Since 1972



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December 26, 2018

Sent electronically Megan Atkinson at “atkmegan@yahoo.com” and Michael Maddux at “michaeljmaddux@gmail.com”

Subject: Complaints regarding the Mary’s Pistols, PDC Case No. 42268

Dear Megan Atkinson and Michael Maddux:

The Public Disclosure Commission (PDC) has completed its review of the complaints you filed on September 26 and October 26, 2018. The complaints alleged that Mary’s Pistols, a new single year political committee, may have violated RCW 42.17A.205 for failure to register as a political committee, .235 and .240 for failure to report contributions and expenditures as a political committee, .255 for failure to report independent expenditures in opposition to Initiative 1639, and .320 for failure to disclose accurate and complete sponsor identification on radio political advertising in opposition to Initiative 1639.

PDC staff reviewed the allegations listed in the complaint; the statutes, rules, and reporting requirements; the C-1pc, C-3, C-4 and C-6 reports filed by Mary’s Pistols; invoices and order information from KAYO 96.9; and the October 30, 2018, and November 7, 2018, responses from Daniel Davies on behalf of Mary’s Pistols.

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

- From September 1 through October 31, 2018, Mary’s Pistols sponsored 623 radio advertising slots in opposition to Initiative 1639 on KAYO 96.9 radio, totaling \$4,015.
- From September 1 through October 26, 2018, Mary’s Pistols solicited contributions via Facebook posts and a collection jar at their cash register, for the express purpose of purchasing additional radio advertising slots in opposition to Initiative 1639, raising a total of \$936.51 in contributions, or 23% of the total cost of advertising.
- Mary’s Pistols was required to register as a political in accordance with RCW 42.17A.205 within two weeks of the expectation of receiving contributions or making expenditures in an election campaign, or not later than September 15, 2018.
- Mary’s Pistols filed a C-1pc on December 6, 2018, 82 days late.

- Mary's Pistols was required by RCW 42.17A.220 to deposit all contributions in the campaign depository within five business days of receipt, and failed to do so.
- Mary's Pistols registered as a single-year political committee organized in opposition to Initiative 1639, selecting the Mini Reporting option for a campaign raising and spending under \$5,000 and receiving no contributions over \$500 from a single source, absolving them from the requirement to file C-3 and C-4 reports of contributions and expenditures in accordance with RCW 42.17A.235.
- At the request of PDC staff and in the interest of transparency, Mary's Pistols filed a C-3 and C-4 report on December 11, 2018, disclosing \$936.51 in anonymous contributions, of which \$636.51 exceeded the \$300 limitation on anonymous contributions set by RCW 42.17A.220(4).
- On December 14, 2018, Mary's Pistols confirmed with PDC staff by email that a \$636.51 payment was being sent by U.S. Mail to the Department of Enterprise Services for deposit into the state general fund.
- Mary's Pistols was required by RCW 42.17A.255 to file an initial C-6 report of independent expenditures or electioneering communications within five business days of their radio advertisings appearing to the public, or not later than September 6, 2018. Mary's Pistols was then obliged to file additional C-6 reports on October 16 and 30, 2018.
- On December 6, 2018, Mary's Pistols filed the missing C-6 reports, between 37 and 96 days late, and after the November 6, 2018, general election.
- Mary's Pistols failed to disclose complete sponsor identification on their radio advertising in accordance with RCW 42.17A.320, comprised of the name and address of the sponsor, a statement that no candidate paid for the advertising, and a list of the names of the top five contributors making contributions in excess of \$700.
- KAYO 96.9 reached out to PDC staff after receiving public inquiries about the sponsorship of the radio advertising and worked with Mary's Pistols to correct the advertising to include the complete sponsor identification required by RCW 42.17A.320.

On December 14, 2018, Mary's Pistols confirmed with PDC staff that the committee had mailed a signed Statement of Understanding (SOU) and a \$150 civil penalty to the Department of Enterprise Services for deposit into the state transparency fund, a Washington State Agency that handles and processes penalty collections for small state agencies. The SOU from Mary's Pistols acknowledged violations of RCW 42.17A.205 for failure to timely register as a political committee, RCW 42.17A.220(4) for receiving anonymous contributions in excess of the \$300 limitation, and RCW 42.17A.255 for failure to timely report independent expenditures in opposition to Initiative 1639.

Based on these findings, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1). If you have questions, you may contact me at (360) 586-4560, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Endorsed by:

s/ _____
Fox Blackhorn
Compliance Coordinator

s/ _____
Peter Lavalley
Executive Director

cc: Mary's Pistols

