



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

April 23, 2021

Delivered electronically to "millsaustin@wavecable.com"

Subject: Complaint regarding Larry Mann, PDC Case 84488

Dear Gerry Austin:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on January 24, 2021. Your complaint alleged Larry Mann may have violated: (1) RCW 42.17A.205, .235 and .240 by failing to register and report as a political committee, contributions and expenditures on PDC Forms C-3 and C-4 concerning the purchase of signs opposing Proposition 1, the South Kitsap School District Levy, on the February 9, 2021 ballot; or (2) RCW 42.17A.255 by failing to report expenditures for levy opposition signs as independent expenditures of \$100 or more on Form C-6, provided Mr. Mann used his own funds for the purchase of signs; and/or (3) RCW 42.17A.260 by failing to file a special report for political advertising presented to the public within 21 days of the February 9, 2021 election, costing \$1,000 or more, on Form C-6. The complaint alleged Mr. Mann was the sponsor of the signs identified in the complaint based on the fact that Mr. Mann made email inquiries to local government officials about the opposition signs, asking why signs opposing the levy had been removed from their locations, but signs supporting the levy had not been removed.

PDC staff reviewed your allegations; the applicable statutes, rules, and reporting requirements; and two response provided by Larry Mann. Staff attempted to identify local sign shop vendors who could state whether Mr. Mann had purchased levy signs. This review was conducted to determine whether the record supports a finding of one or more violations.

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

- The complaint stated the belief that Mr. Mann is responsible for the signs opposing the levy because he made e-mail inquiries to Kitsap County Commissioners Charlotte Garrido, Edward Wolfe, and Robert Gelder; Mayor Rob Putansuu of the City of Port Orchard; and South Kitsap School Director Eric Gattenby. The complaint stated Mr. Mann asked these officials whether their agencies had "ordered the removal of signs opposing the SKSD Levy." The complaint also stated Mr. Mann asked these elected officials for an explanation as to why only signs supporting the Levy remain. The complaint stated it was curious that Mr.

Mann was concerned about this matter, when no other individual or entity had claimed responsibility for the placement of the opposition signs.

- Larry Mann stated, "They have falsely accused me of purchasing and placing signs throughout South Kitsap beginning in August of 2020. I would encourage Austin to produce the photos of me placing signs. Additionally, I would encourage Austin to produce the purchase receipts for said signs."
- Mr. Mann also stated, "I will state this as simply as I can about Austin's complaint against me. I have not in the past put out school opposition signs, have not done any today, nor do I plan to put any out in the future, thus, there is absolutely no reason that requires me to register with the PDC to report collected funds."
- The complainant produced no evidence, such as invoices from commercial advertisers, showing the purchase of levy opposition signs by Mr. Mann, and staff was unable to identify local sign shop vendors who could state whether Mr. Mann had purchased levy signs.

The allegations were speculative and were not backed up with evidence of a violation. In addition, they are denied by the Respondent.

Based on these findings, staff has determined that in this instance, there does not appear to be evidence supporting 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 Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at [pdcc@pdcc.wa.gov](mailto:pdcc@pdcc.wa.gov).

Sincerely,

*Electronically Signed Philip E. Stutzman*

Phil Stutzman  
Compliance Officer

Endorsed by,

*Electronically Signed Barbara Sandahl*

Barbara Sandahl  
Deputy Director  
For Peter Frey Lavalley  
Executive Director

cc: Larry Mann